INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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*Governor*

*Thomas W. Easterly*
*Commissioner*

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

TO: Interested Parties / Applicant

DATE: May 16, 2005

RE: Indian Industries, Inc. / SPM 163-20069-00008

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

# Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

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



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

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

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

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNTV-PMOD.doc 1/10/05

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May 16, 2005

Mr. Jim Allhouse
Indian Industries, Inc. dba Escalade Sports
817 Maxwell Avenue
Evansville, IN 47711

Re: 163-20069
First Significant Permit Modification to
Part 70 Permit No.: 163-7324-00008

Dear Mr. Allhouse:

Indian Industries, Inc. was issued a Part 70 permit on March 18, 1999, for a sporting and athletic goods manufacturing source. An application requesting changes to this permit was received by the Office of Air Quality (OAQ) on December 15, 2004. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of construction of a gun cleaner and modification to the following emission units and pollution control devices:

(a) The following operations for the Murrey pool table manufacturing:

(1) Two (2) finishing spray booths, identified as M 0700 and M 0701, constructed in 2002 and modified in 2005, each with a maximum capacity of coating 0.25 wooden pool tables per hour and 1.0 children's wooden outdoor swing set/play equipment per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through stacks M 0700s and M 0701s, respectively;

(2) One (1) gluing/sanding booth, identified as M 0702, constructed in 2002 and modified in 2005, with a maximum capacity of coating 1.33 pool tables per hour and 1.0 children's wooden outdoor swing set/play equipment per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: M 0702s); and

(3) One (1) gun cleaner, constructed in 2005, with a maximum usage rate of 0.01 gallons of solvent per hour.

All other conditions of the permit shall remain unchanged and in effect.

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 Gaurav Shil, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or at 973-575-2555, extension 3259, or dial 1-800-451-6027, and ask for extension 3-6878.

Sincerely,

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

Attachments
GS / EVP

cc: File – Vanderburgh County
U.S. EPA, Region V
Vanderburgh County Health Department
Air Compliance Section Inspector – Derrick Ohning
Compliance Data Section
Administrative and Development
Technical Support and Modeling

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# PART 70 OPERATING PERMIT
# OFFICE OF AIR QUALITY
# and the
# Evansville Environmental Protection Agency

## Indian Industries, Inc. dba Escalade Sports
## 817 Maxwell Avenue
## Evansville, Indiana 47711

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| Operation Permit No.: T163-7324-00008 | |
|---|---|
| Issued by:<br>Janet G. McCabe, Assistant Commissioner<br>Office of Air Management | Issuance Date: March 18, 1999 |
| 1st Administrative Amendment 163-10894-00008 | Issuance Date: July 28, 1999 |
| 1st Minor Permit Modification 163-11792-00008 | Issuance Date: February 25, 2000 |
| 2nd Minor Permit Modification 163-11954-00008 | Issuance Date: May 8, 2000 |
| 3rd Minor Permit Modification 163-12480-00008 | Issuance Date: October 5, 2000 |
| 2nd Administrative Amendment 163-10894-00008 | Issuance Date: December 20, 2000 |
| First Reopening No. R 163-13505-00008 | Issuance Date: March 13, 2002 |
| 4th Minor Permit Modification 163-15792-00008 | Issuance Date: October 3, 2002 |
| 1st Minor Source Modification 163-15760-00008 | Issuance Date: October 3, 2002 |

| First Significant Permit Modification No.:163-20069-00008 | Pages Affected: 3, 4, 6, 7, 32 to 34<br>Page added: 7a, 34a, and 43a |
|---|---|
| Issued by:<br><br>Paul Dubenetzky, Branch Chief<br>Office of Air Quality | Issuance Date: |

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C.12 Pressure Gauge Specifications

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**
C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**
C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)]
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(g) one (1) undercoater with an electric oven, identified as T0156, with a maximum capacity of coating 138 wooden table tennis boards per hour, utilizing roller application, and exhausting through one (1) stack (S/V ID: T0156s).

(2) The following surface coating operations at the Archery Spray Booth production line identified as Unit# ASB:

(a) one (1) surface coating booth, identified as AO311, with a maximum capacity of coating 135 fiberglass bow limbs per hour, utilizing HVLP application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: AO311s).

(3) One (1) archery fiberglass string roving bow molding operation, identified as Unit# ABM, with a maximum capacity of producing 99 bows per hour, consisting of four (4) resin mix tanks exhausting through one (1) stack (S/V ID: A0053s), four (4) wrapping stations, and four (4) heated bow mold presses, each exhausted inside the plant;

(4) The following significant machining operations:

(a) one (1) pool mill shoda router, with a maximum throughput of 1,250 pounds of particle board per hour; utilizing a dust collector (0429) for particulate control, and exhausting through one (1) stack (S/V ID: 0429s);

(b) one (1) basketball area powermatic CNC router, with a maximum throughput of 2,500 pounds of particle and acrylic board per hour, utilizing a baghouse (0330) for particulate control, and exhausting through one (1) stack (S/V ID: 0330s); and

(c) one (1) archery machining operation, and one (1) pool mill machining operation, with a total maximum throughput of 22,000 pounds of fiberglass and particle board per hour, all utilizing one (1) baghouse (0329) for particulate control, and exhausting through one (1) stack (S/V ID: 0329s).

(5) The fiberglass basketball backboard closed sheet molding production line identified as Unit# B-1 consisting of the following equipment:

(a) one (1) 1000 ton W&W press, with a maximum capacity of producing 30 backboards per hour, exhausting inside the plant;

(b) one (1) 500 ton Onsrud press, with a maximum capacity of producing 7 backboards per hour, exhausting inside the plant; and

(c) one (1) 508 ton French press, with a maximum capacity of producing 8 backboards per hour, exhausting inside the plant.

(d) The addition of one (1) new fiberglass basketball acrylic backboards gluing operation, which has a capacity to glue a maximum of 20 backboards per hour, utilizing a special type spray gun, exhausting inside the building.

(6) The following operations for the Murrey pool table manufacturing:

(a) Two (2) finishing spray booths, identified as M 0700 and M 0701, constructed in 2002 and modified in 2005, each with a maximum capacity of coating 0.25 wooden pool tables per hour and 1.0 children's wooden outdoor swing set/play equipment per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through stacks M 0700s and M 0701s, respectively;

(b) One (1) gluing/sanding booth, identified as M 0702, constructed in 2002 and modified in 2005, with a maximum capacity of coating 1.33 pool tables per hour and 1.0 children's wooden outdoor swing set/play equipment per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: M 0702s);

(c) Woodworking operation with a raw material input of 642 pounds per hour, controlled by a pulse-jet baghouse (M 0704) and exhausting inside the building; and

(d) One (1) gun cleaner, constructed in 2005, with a maximum usage rate of 0.01 gallons of solvent per hour.

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

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

(1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour (mmBtu/hr):

(a) one (1) T-1 table tennis oven, 1.20 mmBtu/hr;
(b) one (1) B0105 BB burn-off oven, 0.50 mmBtu/hr;
(c) one (1) B0632 BB area 0.51 mmBtu/hr twin chamber, twin burner bake off oven;
(d) one (1) Mask washer oven, 0.48 mmBtu/hr;
(e) four (4) space heaters each rated at 5.50 mmBtu/hr;
(f) one (1) space heater, 4.40 mmBtu/hr;
(g) one (1) BB area washer burner, 3.44 mmBtu/hr; and
(h) one (1) BB area dryoff and curing oven, 4.00 mmBtu/hr; and
(i) one (1) natural gas fired drying tunnel, identified as M 0703, with heat input of 0.32 million British thermal units per hour (MMBtu/hr), exhausting through one (1) stack (S/V ID: M 0703s).

(2) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons. (Oil House Dispensing Room #1 and #2 - 55 gallon drums)
(3) Machining where an aqueous cutting coolant continuously floods the machining interface. (CNC Archery machining area)
(4) Degreasing operations that do not exceed 145 gallons (not to include waste solvent shipped off-site) per twelve (12) months, except if subject to 326 IAC 20-6.
(a) Three (3) Safety-Kleen parts cleaner-wash tanks
(5) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
(a) Fifteen (15) weld wire, one (1) robotic welder in basketball, with a total usage rate of 10,000 pounds of weld wire per year (lb/yr), that will exhaust to three (3) roof vents. One (1) weld wire, and one (1) robotic welder in Dept. 100, with a total usage rate of 1,500 lbs/yr. One (1) weld wire in the Machine Shop and one (1) in the Maintenance Shop.
(6) Infrared cure equipment. (Basketball area)
(7) The relocation of the exposure chambers for curing of UV inks and UV coatings from the UV Oven in pool mill room to the table tennis department, where heat is intended to discharge.
(8) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
(9) 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. (Edge-banding table tennis paint line)

(10) Paved and unpaved roads and parking lots with public access.
(11) On-site fire and emergency response training approved by the department.
(12) 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 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
(13) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C. (Archery bow molding and 1000 ton BB press)
(14) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:
    (a) Wall vent for laminator in pool mill room; and
    (b) Three (3) basketball UV ovens with two (2) stacks.

## SECTION D.1 FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]:** The following surface coating operations at the plant:

(1) The following surface coating operations at the Table Tennis production line identified as unit #T1:

(a) One (1) front spray booth identified as T0178 with a maximum capacity of coating 180 wooden table tennis boards per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: T0178s);

(b) One (1) UV Fill machine, identified as T0150, with a maximum capacity of 180 wooden table tennis boards per hour, and exhausting through one (1) stack (S/V ID: T0150s);

(c) one (1) undercoater, identified as T0153, with a maximum capacity of coating 180 wooden table tennis boards per hour, utilizing roller application, and exhausting through two (2) stacks (S/V ID: T0153As, T0153Bs), respectively;

(d) one (1) precision coater, identified as T0154, with a maximum capacity of coating 180 wooden table tennis boards per hour, utilizing roller application, and exhausted through one (1) stack (S/V ID: T0154s);

(e) one (1) back striping machine, identified as T0356, with a maximum capacity of striping 38 wooden table tennis boards per hour, utilizing HVLP application, and exhausted inside the plant;

(f) one (1) back spray booth, identified as T0362, with a maximum capacity of coating 72 wooden table tennis boards per hour, utilizing HVLP application with dry filters for overspray control and exhausted through one (1) stack (S/V ID: T0362s).

(g) one (1) undercoater with an electric oven, identified as T0156, with a maximum capacity of coating 138 wooden table tennis boards per hour, utilizing roller application, and exhausting through one (1) stack (S/V ID: T0156s).

(2) The following surface coating operations at the Archery Spray Booth production line identified as Unit# ASB:

(a) one (1) surface coating booth, identified as AO311, with a maximum capacity of coating 135 fiberglass bow limbs per hour, utilizing HVLP application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: AO311s).

(3) The following operations for the Murrey pool table manufacturing:

(a) Two (2) finishing spray booths, identified as M 0700 and M 0701, constructed in 2002 and modified in 2005, each with a maximum capacity of coating 0.25 wooden pool tables per hour and 1.0 children's wooden outdoor swing set/play equipment per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through stacks M 0700s and M 0701s, respectively;

(b) One (1) gluing/sanding booth, identified as M 0702, constructed in 2002 and modified in 2005, with a maximum capacity of coating 1.33 pool tables per hour and 1.0 children's wooden outdoor swing set/play equipment per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: M 0702s);

(c) One (1) gun cleaner, constructed in 2005, with a maximum usage rate of 0.01 gallons of solvent per hour.

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the table tennis surface coating booths identified as T0154, T0356, and T0362, and the pool table finishing spray booths M 0700 and M 0701 shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Particulate [326 IAC 6-3-2(d)]

(a) Particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for M 0700, M 0701, M 0702, T0178, T0362, AO326, and AO311, and their corresponding dry filter control devices.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5][326 IAC 2-2]

The VOC input to the manufacturing operation of children's wooden outdoor swing sets / play equipment in the Murrey Pool Table Manufacturing area shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This is based on the VOC input of the green primer, enamel topcoat, sand box sealer, wood stain, exterior oil, and VOC solvents input to the units. The VOC usage limit shall ensure compliance with the provisions of 326 IAC 2-7-10.5 (d)(4)(A).

D.1.5 Volatile Organic Compounds (VOC) [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 of gun cleaning facilities in the Murrey pool table manufacturing area 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.

**Compliance Determination Requirements**

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC usage limitation contained in Condition D.1.4 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, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.7 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the surface coating booths identified as T0178, T0362, AO326, AO311, the finishing spray booths, identified as M 0700 and M 0701 and the gluing/sanding booth, identified as M 0702 are in operation.

D.1.8 Monitoring

(a) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily manometer pressure checks shall be performed on the surface coating booths (T0178, T0362, AO326, AO311), the finishing spray booths (M 0700 and M 0701) and the gluing/sanding booth (M 0702) while one or more of the booths are in operation. The pressure drop across each booth shall be maintained within the range specified within the Compliance Response Plan. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
.

(b) Monthly inspections shall be performed for the coating emissions from the stack and the presence of overspray on the nearby ground and annual inspections shall be performed for the presence of overspray on the rooftop. 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.

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

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

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.2, D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily manometer pressure checks, monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(b) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limit established in Condition D.1.4 for the manufacture of children's wooden outdoor swing sets / play equipment in the Murrey Pool Table Manufacturing area. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content (weight percent) of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

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

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1)..

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

**Part 70 Quarterly Report**

Source Name: Indian Industries, Inc. dba Escalade Sports
Source Address: 817 Maxwell Ave. Evansville, IN 47711
Mailing Address: Same as above
Part 70 Permit No.: T163-7324-00008
Facility: Murrey pool table manufacturing area used for producing children's swing sets / play equipment
Parameter: Volatile Organic Compounds (VOC)
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR:_____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---|---|---|---|
| | Total VOC Usage This Month | Total VOC Usage Previous 11 Months | 12 Month Total VOC Usage |
| Month 1 | | | |
| Month 2 | | | |
| Month 3 | | | |

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on:_____

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

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management
# Office of Air Quality

## Technical Support Document (TSD) for a Minor Source Modification and Significant Permit Modification to a Part 70 Operating Permit

### Source Background and Description

| | |
|---|---|
| **Source Name:** | **Indian Industries, Inc., dba Escalade Sports** |
| **Source Location:** | **817 Maxwell Ave. Evansville, IN 47711** |
| **County:** | **Vanderburgh** |
| **SIC Code:** | **3949** |
| **Operation Permit No.:** | **T163-7324-00008** |
| **Operation Permit Issuance Date:** | **March 18, 1999** |
| **Source Modification No.:** | **163-20506-00008** |
| **Permit Modification No.:** | **163-20069-00008** |
| **Permit Reviewer:** | **Gaurav Shil/EVP** |

The Office of Air Quality (OAQ) has reviewed a modification application from Indian Industries, Inc., dba Escalade Sports relating to the use of existing equipment described in the Murrey Pool Table Manufacturing area to manufacture children's wooden outdoor swing sets / play equipment.

### Explanation of Modification Requested

On December 15, 2004, Escalade submitted an application to the OAQ requesting to utilize existing equipment described in the Murrey pool table manufacturing area to manufacture children's wooden outdoor swing sets / play equipment. The potential VOC emissions from the use of coating materials and solvent cleaners for the manufacture of children's wooden outdoor swing sets / play equipment shall be 28.04 tons per year. The Permittee requested a VOC usage limit of twenty-five (25) tons per year. Pursuant to 326 IAC 2-7-10.5 (d)(4)(A), since the potential to emit of VOC is limited to less than twenty-five (25) tons per year by limiting total annual solvent usage, this modification shall be processed according to the procedures specified in 326 IAC 2-7-10.5 (e).

The modification consists of construction of a gun cleaner and modification to the following emission units and pollution control devices:

(a) The following operations for the Murrey pool table manufacturing:

(1) Two (2) finishing spray booths, identified as M 0700 and M 0701, constructed in 2002 and modified in 2005, each with a maximum capacity of coating 0.25 wooden pool tables per hour and 1.0 children's wooden outdoor swing set/play equipment per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through stacks M 0700s and M 0701s, respectively;

(2) One (1) gluing/sanding booth, identified as M 0702, constructed in 2002 and modified in 2005, with a maximum capacity of coating 1.33 pool tables per hour and 1.0 children's wooden outdoor swing set/play equipment per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: M 0702s); and

(3) One (1) gun cleaner, constructed in 2005, with a maximum usage rate of 0.01 gallons of solvent per hour.

**Existing Approvals**

The source was issued a Part 70 Operating Permit (T163-7324-00008) on March 18, 1999. The source has since received the following:

(a) Part 70 permit no. T163-7324-00008, issued on March 18, 1999;

(b) First administrative amendment no. 163-10894-00008, issued on July 28, 1999;

(c) First minor permit modification no. 163-11792-00008, issued on February 25, 2000;

(d) Second minor permit modification no. 163-11954-00008, issued on May 8, 2000;

(e) Third minor permit modification no. 163-12480-00008, issued on October 5, 2000;

(f) Second administrative amendment no. 163-12977-00008, issued on December 20, 2000

(g) First part 70 re-opening no. 163-13505-00008, issued on March 13, 2002; and

(h) Fourth minor permit modification no. 163-15792-00008, issued on October 3, 2002.

**Enforcement Issue**

There are no enforcement actions with the equipment proposed in the modification.

**Stack Summary**

| Stack ID | Operation | Height (feet) | Diameter (inches) | Flow Rate (acfm) | Temperature ($^0$F) |
|---|---|---|---|---|---|
| M0700s | Finishing spray booth M0700 | 28.5 | 30 | 12,750 | ambient |
| M0701s | Finishing spray booth M0701 | 28.5 | 30 | 12,750 | ambient |
| M0702s | Gluing sanding booth M0702 | 28.5 | 42 | 21,400 | ambient |
| M0703s | Drying tunnel | 28.5 | 8 | 3,275 | 140 |

**Recommendation**

The staff recommends to the Commissioner that the Minor Source Modification and Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on December 15, 2004. Additional information was received on January 7, 2005.

**Emission Calculations**

See Appendix A of this document for detailed emissions calculations (6 pages).

**Potential To Emit Before Controls (Modification)**

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."

| Pollutant | Potential To Emit (tons/year) |
|---|---|
| PM | 6.99 |
| PM-10 | 6.99 |
| $SO_2$ | 0.00 |
| VOC | 28.04 |
| CO | 0.00 |
| $NO_x$ | 0.00 |

| HAPs | Potential To Emit (tons/year) |
|---|---|
| Xylene | 4.77 |
| Methyl Ethyl Ketone | 0.07 |
| Toluene | 0.16 |
| Ethylene Benzene | 1.12 |
| TOTAL | 6.1 |

**Justification for Modification**

The Title V permit is being modified through a Minor Source Modification since the Permittee requested a VOC usage limit of twenty-five (25) tons per year from the Murrey Pool Table Manufacturing area to manufacture children's wooden outdoor swing sets / play equipment. Pursuant to 326 IAC 2-7-10.5 (d)(4)(A), since the potential to emit of VOC is limited to less than twenty-five (25) tons per year by limiting total annual solvent usage, this modification shall be processed according to the procedures specified in 326 IAC 2-7-10.5 (e).

This modification will give the source approval to utilize the existing emission units to manufacture children's play equipment. A Significant Permit Modification (163-20069-00008) will be issued and will incorporate the source modification into the Part 70 permit and give the source approval to operate the new emission units. Pursuant to 326 IAC 2-7-12 (d)(1) the Minor Source Modification is being incorporated into the Part 70 permit through a Significant Permit Modification because new emission limits, compliance demonstration and recordkeeping requirements are being added to the Part 70 permit and therefore the permit modification does not meet the criteria in 326 IAC 2-7-12 (b)(1). Hence, the modification shall be processed according to the procedures in 326 IAC 2-7-12 (d).

**County Attainment Status**

The source is located in Vanderburgh County.

| Pollutant | Status |
|---|---|
| PM-10 | Attainment |
| $SO_2$ | Attainment |
| $NO_2$ | Attainment |
| 1-hour Ozone | Attainment |
| 8-hour Ozone | Non- Attainment |
| CO | Attainment |

(a) (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. Vanderburgh County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(b) Vanderburgh County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

**Source Status**

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

| Pollutant | Emissions (tons/year) |
|---|---|
| PM | Less than 250 |
| PM-10 | Less than 250 |
| $SO_2$ | Less than 250 |
| VOC | Greater than 100 |
| CO | Less than 250 |
| NOx | Less than 250 |

(a) This existing source is a major stationary source for PSD review because VOC is emitted at a rate greater than 100 tons per year.

(b) This existing source is a major stationary source under Emission Offset, 326 IAC 2-3 because Vanderburgh County was designated as non-attainment for the 8-hour ozone standard on June 15, 2004 and VOC is emitted at a rate greater than 100 tons per year.

(c) These emissions are based upon the Part 70 permit T163-7324-00008 issued on March 18, 1999.

**Potential to Emit After Controls for the Modification**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

| | Potential to Emit (tons/year) | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Process/facility | PM | PM-10 | $SO_2$ | VOC | CO | $NO_X$ | Single HAP | Total HAPs |
| finishing spray booth (M 0700) | 0.03 | 0.03 | - | 8.80 | - | - | 1.94 | 2.4 |
| finishing spray booth (M 0701) | 0.02 | 0.02 | - | 8.71 | - | - | 2.83 | 3.49 |
| glue/sand booth (M 0702) | 0.02 | 0.02 | - | 10.21 | - | - | 0.0 | 0.0 |
| Gun Cleaner | - | - | - | 0.32 | - | - | 0.16 | 0.23 |
| Total Emissions | 0.07 | 0.07 | - | <25* | - | - | <10 | 6.1 |
| PSD Significant Levels | 25 | 15 | 40 | N/A | 100 | N/A | N/A | N/A |
| Emission Offset Significant Levels | N/A | N/A | N/A | 40 | N/A | N/A | N/A | N/A |

* VOC emissions from the manufacture of children's swing sets/play equipment shall be limited to less than twenty-five (25) tons per year.

(a) This modification to an existing major stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(b) This modification to an existing major stationary source is not major because the VOC emissions increase is less than the Emissions Offset significant levels. Therefore, the Emissions Offset, 326 IAC 2-3 requirements do not apply.

**Federal Rule Applicability**

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

(b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Wood Furniture Manufacturing Operations 40 CFR Part 63, Subpart JJ are not included in the permit because the rule applies to each facility engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR 63.2. Wood furniture is defined in 40 CFR 63.801 as any product made of wood, a wood product such as rattan or wicker, or an engineered wood product such as particleboard that is manufactured under any of the following standard industrial classification codes: 2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 2599, or 5712. Escalade manufactures recreational equipment (swing sets, ping pong tables, basketball goals and archery bows) and has a SIC code of 3949. Therefore, the requirements of 40 CFR 63.800 are not included in the permit.

(c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart QQQQ, National Emission Standards for the Surface Coating of Wood Building Products, are not included in the permit because the source does not apply coating to wood building products.

**40 CFR 64 Compliance Assurance Monitoring**

(a) This minor source modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for any of the criteria pollutants:

(1) with the potential to emit before controls equal to or greater than the major source threshold for any criteria pollutants;
(2) that is subject to an emission limitation or standard for any criteria pollutants; and
(3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

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

**State Rule Applicability - Entire Source**

326 IAC 2-2 (Prevention of Significant Deterioration)

This modification to an existing major stationary source is not major because the modification does not have the potential to emit of any criteria pollutant greater than PSD significant emission thresholds. Therefore, the PSD requirements will continue to not apply.

326 IAC 2-3 (Emissions Offset)

Vanderburgh County has been designated as non-attainment for the 8-hour ozone standard on June 15, 2004. VOC and $NO_X$ emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. The source wide potential to emit of VOC and $NO_X$ is 140.01 and 16.7 tons per year respectively. The source is classified as major for the purpose of Emissions Offset. The VOC emissions from this modification are limited to less than twenty-five (25) tons per year. Since the VOC emissions from the modification are less than the Emissions Offset thresholds the requirements of Emission Offset, 326 IAC 2-3 do not apply.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2006 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

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

(a) Opacity shall not exceed an average of forty percent (40%) 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.

**State Rule Applicability - Individual Facilities**

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

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). Potential single and total HAP emissions from this modification are less than 10 and 25 tons per year, respectively. Therefore, this rule does not apply.

326 IAC 6-1 (Particulate Limitations)

This rule applies to specifically listed sources or facilities, or sources or facilities not specifically listed but located in a listed county and having either a potential to emit of 100 tons per year (tpy) or more or actual emissions of 10 tpy or more of PM. The source has a limited PTE for particulate matter of less than one hundred (100) tons per year. Further, the source operates particulate control devices and has actual particulate emissions of less than 10 tons per year. Therefore, the requirements of 326 IAC 6-1 do not apply and, instead, the requirements of 326 IAC 6-3 are applicable to this source.

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

Particulate from the surface coating operations at the two (2) finishing spray booths, identified as M 0700 and M 0701 and the one (1) gluing/sanding booth shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

326 IAC 8-1-6 (General Reduction Requirements)

The requirements of 326 IAC 8-1-6 apply to facilities constructed after January 1, 1980 which have the potential to emit 25 tons per year or more of VOC and are not regulated by any other provisions of 326 IAC 8. The two (2) finishing spray booths are subject to 326 IAC 8-2-12, therefore, 326 IAC 8-1-6 does not apply. The one (1) gluing/sanding booth has the potential to emit less than 25 tons of VOC per year; therefore, this rule does not apply.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the pool table and swing sets finishing spray booths M 0700 and M 0701 shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The surface coating booths M 0700 and M 0701 utilize HVLP application systems. Therefore, the source is in compliance with 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating).

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2, the owner or operator of the gun cleaner in the Murrey pool table manufacturing area 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.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

(a) The requirements of 326 IAC 8-3-5 apply to any new cold cleaner degreaser located in any county in Indiana and not equipped with remote solvent reservoirs. The gun cleaner facility in the Murrey pool table manufacturing area is equipped with remote solvent reservoir. The gun cleaner, using 0.24 gallons per day of clear lacquer thinner, is equipped with a reservoir that stores the cleaning solvent. The cleaning solvent is pumped and sprayed to clean parts and the used solvent is drummed in covered containers. Therefore, the requirements of 326 IAC 8-3-5 are not included in the permit for the gun cleaner.

326 IAC 20-6-1 (Halogenated solvent cleaning)

326 IAC 20-6-1 is not applicable to the gun cleaner facility in the Murrey pool table manufacturing area because this facility does not use any solvent containing the halogenated compounds listed in 326 IAC 20-6-1 (a).

**Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in

conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The Compliance Monitoring requirements for the finishing spray booths (M 0700 and M 0701) and the gluing/sanding booth (M 0702) are already included in the fourth minor permit modification no. 163-15792-00008, issued on October 3, 2002.

**Changes Proposed**

The changes listed below have been made to the Part 70 Operating Permit (T163-7324-00008).

1. Section A.2, Emission Units and Pollution Control Equipment Summary and the Section D.1 facility description box are revised to reflect the modification to the Murrey pool table manufacturing area:

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

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

……..

(6) The following operations for the Murrey pool table manufacturing:

(a) Two (2) finishing spray booths, identified as M 0700 and M 0701**, constructed in 2002 and modified in 2005**, each with a maximum capacity of coating 0.25 wooden pool tables per hour **and 1.0 children's wooden outdoor swing set/play equipment per hour**, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through stacks M 0700s and M 0701s, respectively;

(b) One (1) gluing/sanding booth, identified as M 0702**, constructed in 2002 and modified in 2005**, with a maximum capacity of coating 1.33 pool tables per hour **and 1.0 children's wooden outdoor swing set/play equipment per hour**, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: M 0702s); ~~and~~

(c) Woodworking operation with a raw material input of 642 pounds per hour, controlled by a pulse-jet baghouse (M 0704) and exhausting inside the building**; and**

**(d) One (1) gun cleaner, constructed in 2005, with a maximum usage rate of 0.01 gallons of solvent per hour.**

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**
……
(3) The following operations for the Murrey pool table manufacturing:

(a) Two (2) finishing spray booths, identified as M 0700 and M 0701**, constructed in 2002 and modified in 2005**, each with a maximum capacity of coating 0.25 wooden pool tables per hour **and 1.0 children's wooden outdoor swing set/play equipment per hour**, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through stacks M 0700s and M 0701s, respectively;

(b) One (1) gluing/sanding booth, identified as M 0702**, constructed in 2002 and modified in 2005**, with a maximum capacity of coating 1.33 pool tables per hour **and 1.0 children's wooden outdoor swing set/play equipment per hour**, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: M 0702s);

**(c) One (1) gun cleaner, constructed in 2005, with a maximum usage rate of 0.01 gallons of solvent per hour.**

2. Condition D.1.2, Particulate Matter (PM) [326 IAC 6-1-2 (a)], and Condition D.1.4 , Testing Requirements [326 IAC 2-7-6 (1), (6)], are deleted from the permit since the limited PTE of particulate matter is less than 100 tpy and actual particulate emissions are less than 10 tpy. 326 IAC 6-3-2 requirements are included in the permit for surface coating operations:

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

~~The PM emissions from the surface coating booths identified as T0178, T0362, T0356, AO326, and AO311, the finishing spray booths, identified as M 0700 and M 0701 and the gluing/sanding booth, identified as M 0702 shall not exceed 0.03 grains per dry standard cubic foot.~~

~~D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]~~

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

3. Condition D.1.2, Particulate, is included in the permit for the finishing spray booths, identified as M 0700 and M 0701, pursuant to 326 IAC 6-3-2 (d) . Condition D.1.7, Recordkeeping Requirements, is revised to include reference to Condition D.1.2. Condition D.1.7 has been redesignated as D.1.9 due to this modification. Conditions D.1.2, D.1.4, D.1.5, D.1.6, D.1.9 (b), and D.1.10 are added to the permit due to this modification. The subsequent condition numbers are revised due to this addition:

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

**D.1.2 Particulate [326 IAC 6-3-2(d)]**

**(a) Particulate from the surface coating manufacturing processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.**

**(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:**

**(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.**

**(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.**

**(c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.**

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

D.1.~~7~~**9** Record Keeping Requirements

(a) To document compliance with Conditions **D.1.2,** D.1.~~5~~**7** and D.1.~~6~~**8**, the Permittee shall maintain a log of weekly overspray observations, daily manometer pressure checks, monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

3. Pursuant to 326 IAC 2-7-10.5 (d)(4)(A), the Permittee requested to limit the potential to emit of VOC from the Murrey pool table manufacturing area while manufacturing children's wooden outdoor swing sets / play equipment to twenty-five (25) tons per year by limiting total annual solvent usage. Conditions D.1.4, D.1.6, D.1.9 (b) and D.1.10 are included in the permit:

**D.1.4 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5][326 IAC 2-2]**

**The VOC input to the manufacturing operation of children's wooden outdoor swing sets / play equipment in the Murrey Pool Table Manufacturing area shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This is based on the VOC input of the green primer, enamel topcoat, sand box sealer, wood stain, exterior oil, and VOC solvents input to the units. The VOC usage limit shall ensure compliance with the provisions of 326 IAC 2-7-10.5 (d)(4)(A).**

**Compliance Determination Requirements**

**D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]**

**Compliance with the VOC usage limitation contained in Condition D.1.4 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, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.**

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

D.1.~~7~~**9** Record Keeping Requirements

……

**(b) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limit established in Condition D.1.4 for the manufacture of children's wooden outdoor swing sets / play equipment in the Murrey Pool Table Manufacturing area. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.**

**(1) The VOC content (weight percent) of each coating material and solvent used.**

**(2) The amount of coating material and solvent less water used on monthly basis.**

**(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**

**(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**

**(3) The volume weighted VOC content of the coatings used for each month;**

**(4) The cleanup solvent usage for each month;**

**(5) The total VOC usage for each month; and**

**(6) The weight of VOCs emitted for each compliance period.**

**D.1.10 Reporting Requirements**

**A quarterly summary of the information to document compliance with Conditions D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

4. The requirements of 326 IAC 8-3-2 (Cold Cleaner Operations) are included in the permit for gun cleaner in the Murrey pool table manufacturing area. Condition D.1.5 is included in the permit:

**D.1.5 Volatile Organic Compounds (VOC) [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 of gun cleaning facilities in the Murrey pool table manufacturing area 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.**

5. Part 70 quarterly report form (Page 43a of 45) is included in this permit since this form is required to document compliance with 25 tpy VOC usage limit for Murrey Pool Table Manufacturing area operations.

**Conclusion**

The operation of the children's swing sets / play equipment manufacturing operation at the existing sporting and athletic goods production source shall be subject to the conditions of the attached proposed Minor Source Modification No. 163-20506-00008 and Significant Permit Modification No. 163-20069-00008.

# Indiana Department of Environmental Management
# Office of Air Quality

## Addendum to the Technical Support Document (TSD) for a Minor Source Modification and Significant Permit Modification to a Part 70 Operating Permit

**Source Background and Description**

| | |
|---|---|
| **Source Name:** | **Indian Industries, Inc., dba Escalade Sports** |
| **Source Location:** | **817 Maxwell Ave. Evansville, IN 47711** |
| **County:** | **Vanderburgh** |
| **SIC Code:** | **3949** |
| **Operation Permit No.:** | **T163-7324-00008** |
| **Operation Permit Issuance Date:** | **March 18, 1999** |
| **Permit Modification No.:** | **163-20069-00008** |
| **Source Modification No.:** | **163-20506-00008** |
| **Permit Reviewer:** | **Gaurav Shil/EVP** |

On February 24, 2005, the Office of Air Quality (OAQ) had a notice published in the Evansville Courier, Evansville, Indiana, stating that Indian Industries, Inc. had applied for a significant permit modification to Part 70 permit T163-7324-00008 to the use of existing equipment described in the Murrey Pool Table Manufacturing area to manufacture children's wooden outdoor swing sets / play equipment. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

No comments were received on the proposed permit. However, upon further consideration, IDEM, OAQ has decided to make changes to the permit as indicated below. Changes made to the permit are shown in bold and deleted permit language is shown with a line through it. Any permit changes affecting the permit's Table of Contents and formatting changes are also made without replication herein.

The following changes are made to the Technical Support Document with this addendum. However IDEM prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the Technical Support Document that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that all comments and responses are documented and part of the records regarding this permit decision.

IDEM agrees that TSD should have read as follows:

**County Attainment Status**

……..

(a) ~~(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. Vanderburgh County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

**Source Status**

Existing Source PSD **and Emission Offset** Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

| Pollutant | Emissions (tons/year) |
|---|---|
| PM | Less than 250 |
| PM-10 | Less than 250 |
| $SO_2$ | Less than 250 |
| VOC | Greater than 100 |
| CO | Less than 250 |
| NOx | Less than ~~250~~**100** |

(a) This existing source is a ~~major~~ **minor** stationary source for PSD review because ~~VOC~~ **no attainment regulated pollutant** is emitted at a rate greater than ~~100~~ **250** tons per year **or more, and it is not one of the 28 listed source categories**.

**Potential to Emit After Controls for the Modification**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

| | Potential to Emit (tons/year) | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Process/facility | PM | PM-10 | $SO_2$ | VOC | CO | $NO_X$ | Single HAP | Total HAPs |
| finishing spray booth (M 0700) | 0.03 | 0.03 | - | 8.80 | - | - | 1.94 | 2.4 |
| finishing spray booth (M 0701) | 0.02 | 0.02 | - | 8.71 | - | - | 2.83 | 3.49 |
| glue/sand booth (M 0702) | 0.02 | 0.02 | - | 10.21 | - | - | 0.0 | 0.0 |
| Gun Cleaner | - | - | - | 0.32 | - | - | 0.16 | 0.23 |
| Total Modification Emissions | 0.07 | 0.07 | - | <25* | - | - | <10 | 6.1 |
| PSD Significant Levels | ~~25~~**250** | ~~15~~**250** | ~~40~~**250** | ~~N/A~~ **40** | ~~100~~ **250** | ~~N/A~~ **100** | N/A | N/A |
| Emission Offset Significant Levels | N/A | N/A | N/A | 40 | N/A | N/A | N/A | N/A |

* VOC emissions from the manufacture of children's swing sets/play equipment shall be limited to less than twenty-five (25) tons per year.

(a) ~~This modification to an existing major stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.~~ **This modification to an existing PSD minor source is not major because the emissions are less than the PSD threshold levels.**

(b) This modification to an existing major stationary source is not major because the VOC emissions increase is less than the Emissions Offset significant level~~s~~. Therefore, the Emissions Offset, 326 IAC 2-3 requirements do not apply.

**40 CFR 64 Compliance Assurance Monitoring**

(a) This ~~minor source~~ modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 for any of the criteria pollutants:
……

**State Rule Applicability - Entire Source**

326 IAC 2-2 (Prevention of Significant Deterioration)
This modification to an existing ~~major~~ **minor** stationary source is not major because the modification does not have the potential to emit of any **attainment** criteria pollutant greater than PSD ~~significant~~ emission thresholds. **The source wide PTE of attainment pollutants will be less than PSD threshold level.** Therefore, the PSD requirements will continue to not apply.

326 IAC 2-3 (Emissions Offset)
Vanderburgh County has been designated as non-attainment for the 8-hour ozone standard on June 15, 2004. VOC and $NO_X$ emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. The source wide potential to emit of VOC and $NO_X$ is 140.01 and 16.7 tons per year respectively. The source is classified as major for the purpose of Emissions Offset. The VOC emissions from this modification are limited to less than twenty-five (25) tons per year. Since the VOC emissions from the modification are less than the Emissions Offset **significant level,** ~~thresholds~~ the requirements of Emission Offset, 326 IAC 2-3 do not apply.

**Changes Proposed**

The changes listed below have been made to the Part 70 Operating Permit (T163-7324-00008).

……..

2. Condition D.1.2, Particulate Matter (PM) [326 IAC 6-1-2 (a)]~~, and Condition D.1.4 , Testing Requirements [326 IAC 2-7-6 (1), (6)], are~~ **is** deleted from the permit since the limited PTE of particulate matter is less than 100 tpy and actual particulate emissions are less than 10 tpy. 326 IAC 6-3-2 requirements are included in the permit for surface coating operations~~:~~**. The** Condition D.1.4, Testing Requirements [326 IAC 2-7-6 (1), (6)], **is deleted from the permit since the PTE before control is less than 40 tpy.**

# Appendix A: Emissions Calculations

## Potential Emissions from Entire source

**Company Name:** Indian Industries, Inc., dba Escalade Sports
**Address City IN Zip:** 817 Maxwell Ave. Evansville, IN 47711
**Title V MSM No.:** T163-20506-00008
**Title V SPM No.:** T163-20069-00008
**Reviewer:** GS/ EVP
**Date:** 5/17/05

**Uncontrolled Potential Emissions (including modification)**

| Emission Unit | PM | PM-10 | SO2 | NOx | VOC | CO | Single | HAPS |
|---|---|---|---|---|---|---|---|---|
| | (tons / yr) | (tons / yr) | (tons / yr) | (tons / yr) | (tons / yr) | (tons / yr) | HAP | (tons / yr) |
| Archery Bow Molding (ABM | 0 | 0 | 0 | 0 | 27.23 | 0 | 12.49 (Styrene) 14.74 (Methanol) | 27.23 |
| Murrey Pool | 122.33 | 122.33 | 0 | 0 | 31.12 | 0 | 4.77 (Xylene) 1.87 (Ethyl Benzene) | 8.57 |
| Table Tennis (Unit # T1) | 4.93 | 4.93 | 0 | 0 | 23.63 | 0 | 12.9 (Glycol Ethers) | 14.21 |
| Archery Spray Booth (ASB) | 1.87 | 1.87 | 0 | 0 | 45.22 | 0 | 17.74 (Toluene) 6.65 (MEK) | 28.83 |
| Machining (EU 0329+ EU 0429) | 2478.92 | 2478.92 | 0 | 0 | 0 | 0 | 0 | 0 |
| Natural Gas | 0.01 | 1.27 | 0.1 | 16.7 | 0.92 | 14.04 | negligible | negligible |
| **Total** | 2608.06 | 2609.32 | 0.1 | 16.7 | 128.12 | 14.04 | | 78.84 |

**Controlled Potential Emissions (including modification)**

| Emission Unit | PM | PM-10 | SO2 | NOx | VOC | CO | Single | HAPS | Particulate Control Efficiency |
|---|---|---|---|---|---|---|---|---|---|
| | (tons / yr) | (tons / yr) | (tons / yr) | (tons / yr) | (tons / yr) | (tons / yr) | HAP | (tons / yr) | |
| Archery Bow Molding (ABM | 0 | 0 | 0 | 0 | 27.23 | 0 | 12.49 (Styrene) 14.74 (Methanol) | 27.23 | 0.00% |
| Murrey Pool | 1.22 | 1.22 | 0 | 0 | 31.12 | 0 | 4.77 (Xylene) 1.87 (Ethyl Benzene) | 8.57 | 99.00% |
| Table Tennis (Unit # T1) | 4.93 | 4.93 | 0 | 0 | 23.63 | 0 | 12.9 (Glycol Ethers) | 14.21 | 0.00% |
| Archery Spray Booth (ASB) | 1.87 | 1.87 | 0 | 0 | 45.22 | 0 | 17.74 (Toluene) 6.65 (MEK) | 28.83 | 0.00% |
| Machining (EU 0329+ EU0429) | 24.79 | 24.79 | 0 | 0 | 0 | 0 | 0 | 0 | 99.00% |
| Natural Gas | 0.01 | 1.27 | 0.10 | 16.70 | 0.92 | 14.04 | negligible | negligible | 0.00% |
| **Total** | 32.82 | 34.08 | 0.1 | 16.7 | 128.12 | 14.04 | | 78.84 | |

**Appendix A: Emissions Calculations**

## Potential Emissions from Murrey Pool Table Manufacturing (used for children's wooden outdoor swing sets/play equipment)

**Company Name:** Indian Industries, Inc., dba Escalade Sports
**Address City IN Zip:** 817 Maxwell Ave. Evansville, IN 47711
**Title V MSM No.:** T163-20506-00008
**Title V SPM No.:** T163-20069-00008
**Reviewer:** GS/ EVP
**Date:** 5/17/05

| Material / Product Coated | Booth I.D | Density (Lb/Gal) | Weight % Volatile (H20 & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC pounds per hour | Potential VOC pounds per day | Potential VOC tons per year | Particulate Potential (ton/yr) | lb VOC/gal solids | Transfer Efficiency |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Finishing Booth - M 0700** | | | | | | | | | | | | | | | | | |
| Forest Green Primer | M 0700 | 9.74 | 42.28% | 0.00% | 42.28% | 0.00% | 40.19% | 0.4880 | 1.00 | 4.12 | 4.12 | 2.01 | 48.23 | 8.80 | 3.00 | 10.25 | 75% |
| **Finishing Booth - M 0701** | | | | | | | | | | | | | | | | | |
| Dark Green Satin AD Enamel Topcoat | M 0701 | 8.64 | 47.19% | 0.00% | 47.19% | 0.00% | 40.29% | 0.4880 | 1.00 | 4.08 | 4.08 | 1.99 | 47.75 | 8.71 | 2.44 | 10.12 | 75% |
| **Gluing/Sanding Booth - M 702** | | | | | | | | | | | | | | | | | |
| Gold exterior oil | M 0702 | 7.67 | 62.25% | 0.00% | 62.25% | 0.00% | 27.78% | 0.4880 | 1.00 | 4.77 | 4.77 | 2.33 | 55.92 | 10.21 | 1.55 | 17.19 | 75% |
| | | | | | | | | | | | | | | | | | |
| Clear lacquer thinner | Gun cleaner | 6.96 | 100.00% | 0.00% | 100.00% | 0.00% | 0.00% | 0.2500 | 0.04 | 6.96 | 6.96 | 0.07 | 1.75 | 0.32 | 0.00 | N/A | 75% |

**State Potential Emissions** **6.40** **153.66** **28.04** **6.99**

**Controlled Potential Emissions**

| | Control Efficiency: VOC | Control Efficiency: PM | Controlled VOC lbs per Hour | Controlled VOC lbs per Day | Controlled VOC tons per Year | Controlled PM tons/yr |
|---|---|---|---|---|---|---|
| **Total Controlled Potential Emissions:** | 0.00% | 99.00% | **6.40** | **153.66** | **28.04** | **0.07** |

| **Total Emissions** | **VOC** | **PM/PM10** |
|---|---|---|
| **Uncontrolled (tons/yr)** | **28.04** | **6.99** |
| **Controlled (tons/yr)** | **28.04** | **0.07** |

METHODOLOGY

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

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

**Company Name:** Indian Industries, Inc., dba Escalade Sports
**Address City IN Zip:** 817 Maxwell Ave. Evansville, IN 47711
**Title V MSM No.:** T163-20506-00008
**Title V SPM No.:** T163-20069-00008
**Reviewer:** GS/ EVP
**Date:** 5/17/05

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Xylenes | Weight % Methyl Ethyl Ketone | Weight % Toluene | Weight % Ethyl Benzene | Xylene Emissions (ton/yr) | MEK Emissions (ton/yr) | Toluene Emissions (ton/yr) | Ethylene Benzene Emissions (ton/yr) |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | | | |
| Forest Green Primer | 9.74 | 0.48800 | 1.000 | 9.31% | 0.00% | 0.00% | 2.20% | 1.94 | 0.00 | 0.00 | 0.46 |
| Dark Green Satin AD Enamel Topcoat | 8.64 | 0.48800 | 1.000 | 15.31% | 0.00% | 0.00% | 3.59% | 2.83 | 0.00 | 0.00 | 0.66 |
| Clear lacquer thinner | 6.96 | 0.25000 | 0.040 | 0.00% | 23.68% | 51.18% | 0.00% | 0.00 | 0.07 | 0.16 | 0.00 |
| | | | | | | | | | | | |
| **Total State Potential Emissions** | | | | | | | | **4.77** | **0.07** | **0.16** | **1.12** |

**Total HAP Emissions (tons per year)** **6.1**

**METHODOLOGY**

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

**Appendix A: Emissions Calculations**

# Potential Emissions from Woodworking/Plastics Machining (M0704)*

**Company Name:** Indian Industries, Inc., dba Escalade Sports
**Address City IN Zip:** 817 Maxwell Ave. Evansville, IN 47711
**Title V MSM No.:** T163-20506-00008
**Title V SPM No.:** T163-20069-00008
**Reviewer:** GS/ EVP
**Date:** 5/17/05

**State Potential Uncontrolled Emissions (tons/year)**

**A. Baghouses**

| Process | No. of Units | Grain Loading per Actual Cubic Foot of Outlet Air | Air to Cloth Ratio Air Flow (acfm/ft²) | Total Filter Area (ft²) | Control Efficiency | Total (ton/yr) | Total (lb/hr) |
|---|---|---|---|---|---|---|---|
| | | | | | | | |
| Murrey pool table / Woodworking (M 0704) | 1 | 0.00253 | 7.5 | 1600 | 99.00% | 113.98 | 26.02 |

**:ate Potential Uncontrolled Emissions** 113.98

**State Potential Controlled Emissions (tons/year)**

**A. Baghouses**

| Process | No. of Units | Grain Loading per Actual Cubic Foot of Outlet Air | Air to Cloth Ratio Air Flow (acfm/ft²) | Total Filter Area (ft²) | Control Efficiency | Total (ton/yr) | Total (lb/hr) |
|---|---|---|---|---|---|---|---|
| | | | | | | | |
| Murrey pool table / Woodworking (M 0704) | 1 | 0.00253 | 7.5 | 1600 | 99.00% | 1.14 | 0.26 |

**State Potential Controlled Emissions** 1.14

* M0704 is a permitted emission unit pursuant to fourth minor permit modification no. 163-15792-00008, issued on October 3, 2002. There is no change in emissions from this unit due to this modification.

Methodology:

State Potential (uncontrolled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

The allowable PM emission rate pursuant to 326 IAC 6-3-2(c), Process Operations, for weight rates up to 60,000 lb/hr is determined using the following formula:

E = 4.1 * P^0.67 where: E = allowable PM emission rate (lb/hr)
P = process weight rate (tons/hr)

| | | |
|---|---|---|
| Maximum process rate, P = | 0.321 | tons/hour |
| Allowable emission rate, E = | 1.91 | lb/hr |
| Maximum controlled emissions = | 0.26 | lb/hr |

Based on the above data, the wooodworking machining in the Murrey Pool Table Manufacturing area shall be in compliance with the 326 IAC 6-3-2 emission limits.

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

**Company Name:** Indian Industries, Inc., dba Escalade Sports
**Address City IN Zip:** 817 Maxwell Ave. Evansville, IN 47711
**Title V MSM No.:** T163-20506-00008
**Title V SPM No.:** T163-20069-00008
**Reviewer:** GS/ EVP
**Date:** 5/17/05

| Heat Input Capacity MMBtu/hr | Potential Throughput MMCF/yr |
|---|---|
| 0.32 | 2.80 |

| | Pollutant | | | | | |
|---|---|---|---|---|---|---|
| | PM | PM10 | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMCF | 7.6 | 7.6 | 0.6 | 100.0<br>*see below | 5.5 | 84.0 |
| Potential Emission in tons/yr | 0.01 | 0.01 | 0.00 | 0.14 | 0.01 | 0.12 |

* Drying tunnel is a permitted emission unit pursuant to fourth minor permit modification no. 163-15792-00008, issued on October 3, 2002. There is no change in emissions from this unit due to this modification.

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
PM emission factors are condensable and filterable.

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
See page 4 for HAPs emissions calculations.

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

**Company Name:** Indian Industries, Inc., dba Escalade Sports
**Address City IN Zip:** 817 Maxwell Ave. Evansville, IN 47711
**Title V MSM No.:** T163-20506-00008
**Title V MPM No.:** T163-20069-00008
**Reviewer:** GS/ EVP
**Date:** 5/17/05

| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
|---|---|---|---|---|---|
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emission in tons/yr | 0.0000 | 0.0000 | 0.0001 | 0.0025 | 0.0000 |

**HAPs - Metals (Boiler A3)**

| | Lead | Barium | Chromium | Vanadium | Nickel |
|---|---|---|---|---|---|
| Emission Factor in lb/MMcf | 5.0E-04 | 4.4E-03 | 1.4E-03 | 2.3E-03 | 2.1E-03 |
| Potential Emission in tons/yr | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

Methodology is the same as Page 2

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