



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: May 17, 2005
RE: Envirex, Inc. / 077-20281-00010
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.

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 impracticable 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.



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

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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May 17, 2005

Mr. Lonnie L. Crutcher
Envirex, Inc.
2753 Michigan Road
Madison, Indiana 47250

Re: 077-20281-00010
First Significant Permit Modification to
Part 70 Permit No.: T077-17516-00010

Dear Mr. Crutcher:

Envirex, Inc. was issued a renewed Part 70 operation permit T077-17516-00010 on October 3, 2003 for a stationary water/wastewater treatment metal equipment manufacturing source located at 2753 Michigan Road, Madison, Indiana 47250. A letter requesting changes to this permit was received by the Office of Air Quality (OAQ) on January 6, 2005. The source requested that the normal pressure drop range requirement for the two (2) baghouses (EU4 and EU5) in Section D.2.5 - Parametric Monitoring be changed.

Upon further review of the permit and the associated Technical Support Document, it was determined by OAQ that compliance monitoring is not required for either of the baghouses, since the particulate matter emissions from each of the units do not warrant monitoring. Therefore, the requirements and conditions of Section D.2.2 and Sections D.2.4 through D.2.8 are not applicable to the source and the permit has been revised accordingly. In addition, OAQ determined that it was necessary to add language to Section B addressing credible evidence. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in this Technical Support Document.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nathan Bell, at (800) 451-6027, press 0 and ask for Nathan Bell or extension (4-3350), or dial (317) 234-3350.

Sincerely,

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

ncb

Attachments

cc: File - Jefferson County
U.S. EPA, Region V
Jefferson County Health Department
Air Compliance Section Inspector - Alexandra Yeung
Compliance Data Section
Administrative and Development



Mitchell E. Daniels, Jr.
 Governor

Thomas W. Easterly
 Commissioner

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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Envirex, Inc.
 2753 Michigan Road
 Madison, Indiana 47250**

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

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

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

Operation Permit No.: T077-17516-00010	
Issued by: Original Signed By Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: October 3, 2003 Expiration Date: October 3, 2008
First Significant Permit Modification No.: 077-20281-00010	Pages Affected: 2, 3, 4, 14, 26, 27, 28
Issued by: Original signed by Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: May 17, 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). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary water/wastewater treatment metal equipment fabrication operation.

Responsible Official:	Mgr. Env, Health, & Safety
Source Address:	2753 Michigan Road, Madison, Indiana 47250
Mailing Address:	2753 Michigan Road, Madison, Indiana 47250
General Source Phone Number:	(812) 273-1484
SIC Code:	3443
County Location:	Jefferson
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act

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

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

- (a) Three (3) surface coating booths, identified as EU1, EU2, and EU3, each with a maximum capacity of 252 gallons of paint per hour and 0.54 gallons of thinner per hour, utilizing the airless method of spraying, using dry filters as control, and exhausting at three (3) stacks, identified as S/V1, S/V2, and S/V3.
- (b) Two (2) mechanical shot blasters, identified as EU4 and EU5, with a maximum input of 18 pounds of fresh steel shot per hour, using two (2) baghouses, identified as CE4 and CE5, and exhausting to two (2) stacks, identified as S/V4 and S/V5.

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 does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

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

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because it is a major source, as defined in 326 IAC 2-7-1(22).

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

B.24 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

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

SECTION D.2 FACILITY OPERATION CONDITIONS

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

Two (2) mechanical shot blasters, identified as EU4 and EU5, with a maximum input of 18 pounds of fresh steel shot per hour, using two (2) baghouses, identified as CE4 and CE5, and exhausting to two (2) stacks, identified as S/V4 and S/V5.

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

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

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the two (2) mechanical shot blasters EU4 and EU5 shall not exceed 8.09 and 5.09 pounds per hour, respectively, when operating at a process weight rate of 2.76 and 1.38 tons per hour, respectively. The pounds per hour limitation was calculated using the following equation:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.2 Particulate Control

Pursuant to T077-6461-00010, issued on 9/23/1998, and in order to comply with D.2.1, the baghouses for particulate control shall be in operation and control emissions from the two (2) mechanical shot blasters EU4 and EU5 at all times that the two (2) mechanical shot blasters EU4 and EU5 are in operation.

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**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a
Significant Permit Modification to a
Part 70 Operating Permit**

Source Background and Description

Source Name:	Envirex, Inc.
Source Location:	2753 Michigan Road, Madison, Indiana 47250
County:	Jefferson
SIC Code:	3443
Operation Permit No.:	T077-17516-00010
Operation Permit Issuance Date:	October 3, 2003
Significant Permit Modification No.:	077-20281-00010
Permit Reviewer:	Nathan C. Bell

History

Envirex, Inc. was issued a renewed Part 70 operation permit T077-17516-00010 on October 3, 2003 for a stationary water/wastewater treatment metal equipment manufacturing source located at 2753 Michigan Road, Madison, Indiana 47250. A letter requesting changes to this permit was received by the Office of Air Quality (OAQ) on January 6, 2005. The source requested that the normal pressure drop range requirement for the two (2) baghouses (EU4 and EU5) in Section D.2.5 - Parametric Monitoring be changed.

Upon further review of the permit and the associated Technical Support Document, it was determined by OAQ that compliance monitoring is not required for either of the baghouses, since the particulate matter emissions from each of the units do not warrant monitoring. Therefore, the requirements and conditions of Section D.2.2 and Sections D.2.4 through D.2.8 are not applicable to the source and the permit has been revised accordingly. In addition, OAQ determined that it was necessary to add language to Section B addressing credible evidence. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in this Technical Support Document.

Justification for the Modification

The Part 70 Permit is being revised through a Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(d): "Every significant change in existing monitoring Part 70 permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions shall be considered significant."

Since this modification would remove the compliance monitoring requirements and record keeping and reporting requirements, this modification will be significant.

Recommendation

The staff recommends to the Commissioner that the 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 January 6, 2005

Changes to Permit

Pursuant to the provisions of 326 IAC 2-7-12(d), the permit is hereby modified as follows, with deleted language as ~~strikeouts~~ and new language **bolded**:

B.24 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

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

~~D.2.2 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 these facilities and their control device.~~

Compliance Determination Requirements

~~D.2.32 Particulate Control~~

~~Pursuant to T077-6461-00010, issued on 9/23/1998, and in order to comply with D.2.1, the baghouses for particulate control shall be in operation and control emissions from the two (2) mechanical shot blasters EU4 and EU5 at all times that the two (2) mechanical shot blasters EU4 and EU5 are in operation.~~

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

~~D.2.4 Visible Emissions Notations~~

- ~~(a) Visible emission notations of each of the two (2) mechanical shot blasters EU4 and EU5 stack exhausts shall be performed once per shift during normal daylight operations. 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 violation of this permit.~~

D.2.5 Parametric Monitoring

~~The Permittee shall record the total static pressure drop across each baghouse used in conjunction with the two (2) mechanical shot blasters EU4 and EU5 at least once per shift when the respective mechanical shot blasters EU4 or EU5 is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 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 - Preparation, Implementation, Records, and Reports. 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.~~

~~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 shall be calibrated at least once every six (6) months.~~

D.2.6 Baghouse Inspections

~~An inspection shall be performed within the last month of each calendar quarter of all bags controlling the two (2) mechanical shot blasters EU4 and EU5. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

D.2.7 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 violation of 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 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).~~

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

~~D.2.8 Record Keeping Requirements~~

- ~~(a) To document compliance with Condition D.2.4, the Permittee shall maintain records of visible emission notations of the two (2) mechanical shot blasters EU4 and EU5 stack exhausts once per shift.~~
- ~~(b) To document compliance with Condition D.2.5, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation.~~
- ~~(c) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6.~~
- ~~(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

Conclusion

The operation of this stationary water/wastewater treatment metal equipment manufacturing source shall be subject to the conditions of the attached proposed Significant Permit Modification No. T077-20281-00010.