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Mayor

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

CITY OF HAMMOND

RONALD L. NOVAK
Director

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) Renewal

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

and

**Hammond Department of Environmental Management
-Air Pollution Control Division-**

**George O'Day's Shop, Inc.
19 – 143rd Street
Hammond, Indiana 46327**

(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 provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. 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 2-8 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.: F089-21178-00459	
Issued by: Original signed by:	Issuance Date: September 8, 2005
Ronald L. Novak, Director Hammond Department of Environmental Management	Expiration Date: September 8, 2010

Table of Contents

SECTION A	SOURCE SUMMARY.....	4
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
A.5	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
SECTION B	GENERAL CONDITIONS.....	6
B.1	Permit No Defense [IC 13]	
B.2	Definitions [326 IAC 2-8-1]	
B.3	Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.6	Severability [326 IAC 2-8-4(4)]	
B.7	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.8	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.10	Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]	
B.11	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.12	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]	
B.13	Emergency Provisions [326 IAC 2-8-12]	
B.14	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.15	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.16	Permit Renewal [326 IAC 2-8-3(h)]	
B.17	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.18	Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.19	Permit Revision Requirement [326 IAC 2-8-11.1]	
B.20	Inspection and Entry [326 IAC 2-8-5(a)(2)][IC13-14-2-2][IC 13-17-3-2][IC13-30-3-1]	
B.21	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.22	Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.23	Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS.....	16
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Overall Source Limit [326 IAC 2-8]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1][IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Fugitive Dust Emissions [326 IAC 6-1-11.1]	
C.7	Operation of Equipment [326 IAC 2-8-5(a)(4)]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61 Subpart M]	
	Testing Requirements [326 IAC 2-8-4(3)]	
C.9	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.10	Compliance Requirements [326 IAC 2-1.1-11]	

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

- C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.12 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]
- C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]
[326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.15 Compliance Response Plan -Preparation, Implementation, Records, and Reports
[326 IAC 2-8-4][326 IAC 2-8-5]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

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

- C.17 Annual Emission Inventory [Hammond Ordinance No. 7102]
- C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS

Locker and Towel Cabinet Stripping and Repainting - Two (2) Paint Booths23

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

- D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9] [Local Ordinance 3522]
- D.1.2 Emission Offset Minor Limit [326 IAC 2-3] [326 IAC 2-8]
- D.1.3 Particulate Matter less than 10 microns in diameter (PM₁₀) [326 IAC 2-1.1-10]
[Local Ordinance 7102]
- D.1.4 Particulate Emission Limitations, Work Practices, and Control Technologies
[326 IAC 6-3-2]
- D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.6 Particulate Matter less than 10 microns in diameter (PM₁₀)
- D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]
[Local Ordinance 3522]

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

- D.1.8 Monitoring

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

- D.1.9 Record Keeping Requirements
- D.1.10 Reporting Requirements

Certification Form26
Emergency Occurrence Form.....27
Quarterly Report Form29
Quarterly Deviation and Compliance Monitoring Report Form30

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a Locker and Towel Cabinet Stripping and Repainting facility.

Authorized individual: President
Source Address: 19 -143rd Street, Hammond, Indiana 46327
Mailing Address: same
SIC Code: 3479 – Stripping and Repainting Lockers and Towel Cabinets

Source Location Status: Lake County
Nonattainment for PM_{2.5}
Nonattainment for SO₂
Nonattainment for ozone under the 8-hour standard
Nonattainment for ozone under the 1-hour standard
Attainment for all other criteria pollutants

Source Status: Federally Enforceable State Operating Permit (FESOP)
Major Source, under Emission Offset Rules;
Minor Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) Caustic Stripping and Rust Stop Application Station, identified as Building 5, constructed in 2004, with a maximum rate of 10.6 towel cabinets per hour, using no emissions control, and exhausting to the general vent.
- (b) One (1) Devilbiss spray paint booth, identified as Booth 1 (EU-01), constructed in 2004, with a maximum rate of 12.5 towel cabinets or 40 interior mechanisms per hour, using dry panel particulate filters for overspray control, and exhausting to stack S-1. An electric drying oven follows Booth 1 and exhausts to stack S-2.
- (c) One (1) TBI-Team Blowtherm spray paint booth, identified as Booth 2 (EU-02), constructed in 2004, with a maximum rate of 6.25 lockers per hour, using dry panel particulate filters for overspray control, and exhausting to stack S-3. Lockers are air-dried.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour:
 - i) 20 space heaters @ 0.085 million BTU per hour,
 - ii) 10 space heaters @ 0.200 million BTU per hour.
- (b) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment:
 - i) dry panel filters for Booth 1 changed as needed,
 - ii) dry panel filters for Booth 2 changed as needed.

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

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

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

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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

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

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

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

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

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

- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, HDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by HDEM.

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

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ and HDEM within a reasonable time, any information that IDEM, OAQ and HDEM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and HDEM copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 when furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

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

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

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and HDEM on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ and HDEM upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and HDEM. IDEM, OAQ and HDEM may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and HDEM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM:

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

and

HDEM

Telephone No.: 219-853-6306
Facsimile No.: 219-853-6343

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ and HDEM may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ and HDEM by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement

that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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

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

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

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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

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

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

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

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

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

and

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

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

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

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

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

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

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

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

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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

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

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

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

B.23 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Fugitive Dust Emissions [326 IAC 6-1-11.1]

The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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

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

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

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

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

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

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

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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

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

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

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

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and HDEM upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ and HDEM of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

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

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ and HDEM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.17 Annual Emission Inventory [Hammond Ordinance No. 7102]

The Permittee shall submit an annual emission inventory containing the production information necessary to determine compliance and confirm the source classification and permit level. The emission inventory must be received by April 15th of each year. The submittal should cover the twelve (12) consecutive month time period starting January 1 and ending December 31. This is a local requirement only. The emission inventory must be submitted to:

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue - Room 304
Hammond, Indiana 46320

This inventory does require a signed certification sheet by a company representative.

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue - Room 304
Hammond, Indiana 46320

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and HDEM on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) Caustic Stripping and Rust Stop Application Station, identified as Building 5, constructed in 2004, with a maximum rate of 10.6 towel cabinets per hour, using no emissions control, and exhausting to the general vent.
- (b) One (1) Devilbiss spray paint booth, identified as Booth 1 (EU-01), constructed in 2004, with a maximum rate of 12.5 towel cabinets or 40 interior mechanisms per hour, using dry panel particulate filters for overspray control, and exhausting to stack S-1. An electric drying oven follows Booth 1 and exhausts to stack S-2.
- (c) One (1) TBI-Team Blowtherm spray paint booth, identified as Booth 2 (EU-02), constructed in 2004, with a maximum rate of 6.25 lockers per hour, using dry panel particulate filters for overspray control, and exhausting to stack S-3. Lockers are air-dried.

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

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

D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9] [Local Ordinance 3522]

- (a) Pursuant to 326 IAC 8-2-9(d), (Miscellaneous Metal Coating Operations) the owner or operator shall not allow the discharge into the atmosphere of volatile organic compounds (VOC) in excess of three and five-tenths (3.5) pounds per gallon of coating, excluding water, as delivered to the applicator for a coating application system that is air-dried or forced warm air dried.
- (b) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of Booths 1 and 2 during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.
- (c) The Permittee shall not cause any emissions from the paint booths to create any nuisance as specified in the City of Hammond Air Quality Control Ordinance 3522 (as amended), Article VI, Section 6.11 – Nuisance Abatement.

D.1.2 Emission Offset Minor Limit [326 IAC 2-3] [326 IAC 2-8]

The total input of VOC, including coatings, dilution solvents, and cleaning solvents shall be less than twenty-five (25) tons per 12 consecutive month period with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) and the Part 70 Operating Permit Program (326 IAC 2-7) not applicable.

D.1.3 Particulate Matter less than 10 microns in diameter (PM₁₀) [326 IAC 2-1.1-10] [Local Ordinance 7102]

Pursuant to 326 IAC 2-1.1-10(b) and the Hammond Ordinance 7102, which uses as a minimum the standards found in Title 326 of the Indiana Administrative Code, the PM₁₀ emissions from Booth 1 and Booth 2 shall be limited to 0.23 lbs/hr and 0.41 lbs/hr respectively. These are technology-based emission limits based on the potential to emit after control and the dry filter specifications as submitted by the Permittee.

D.1.4 Particulate Emission Limitations, Work Practices, and Control Technologies (326 IAC 6-3-2)

Pursuant to 326 IAC 6-3-2(d), surface coating manufacturing processes (Booth 1 and Booth 2) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and shall operate the control device in accordance with manufacturer's specifications.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.6 Particulate Matter less than 10 microns in diameter (PM₁₀)

In order to comply with condition D.1.3 and D.1.4, the dry panel particulate filters for particulate control shall be in operation and control emissions from the spray paint booths at all times that the spray paint booths are in operation.

D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4] [Local Ordinance 7102]

- (a) Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ and HDEM reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Pursuant to the Hammond Ordinance 7102, the Permittee shall submit a formal request to use any new or different coatings. This request must be submitted at least seven (7) days in advance of use and shall include a material safety data sheet (MSDS). The new coating must be approved by HDEM to meet the standards outlined in condition D.1.1 (a).

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

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S-1 and S-3) while the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from each stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits and the VOC usage limits established in Conditions D.1.1 and D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content 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 cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the addresses 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).
- (b) The Permittee shall annually submit a compliance certification report in accordance with Condition B.11 – Annual Compliance Certification [326 IAC 2-8-5(a)(1)].

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
-Air Pollution Control Division-**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: **George O'Day's Shop, Inc.**
Source Address: 19 – 143rd Street, Hammond, Indiana 46327
Mailing Address: same
FESOP No.: **F089-21178-00459**

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
-AIR POLLUTION CONTROL DIVISION-
5925 Calumet Avenue – Room 304
Hammond, Indiana 46320
Phone: 219-853-6306
Fax: 219-853-6343**

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

Source Name: **George O'Day's Shop, Inc.**
Source Address: 19 – 143rd Street, Hammond, Indiana 46327
Mailing Address: same
FESOP No.: **F089-21178-00459**

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

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

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
-Air Pollution Control Division-**

FESOP Quarterly Report

Source Name: **George O'Day's Shop, Inc.**
Source Address: 19 – 143rd Street, Hammond, Indiana 46327
Mailing Address: same
FESOP No.: **F089-21178-00459**
Facilities: Preparation, Spray Paint Booths #1 and #2, and Clean-up
Parameter: VOC Usage
Limit: Twenty-five (25) tons per year; Twelve (12) month rolling total.

Reporting Quarter: _____

Year: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
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
COMPLIANCE DATA SECTION**

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
-AIR POLLUTION CONTROL DIVISION-**

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

Source Name: **George O'Day's Shop, Inc.**
Source Address: 19 – 143rd Street, Hammond, Indiana 46327
Mailing Address: same
FESOP No.: **F089-21178-00459**

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

and

**Hammond Department of Environmental Management
Air Pollution Control Division**

**Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP) Renewal**

Source Background and Description

Source Name: George O'Day's Shop, Inc.
Source Location: 19 – 143rd Street, Hammond, Indiana
County: Lake
SIC Code: 3479 – Stripping and Repainting Lockers and Towel Cabinets
Operation Permit No.: F089-21178-00459
Permit Reviewer: Ronald Holder

The Hammond Department of Environmental Management (HDEM) has reviewed a FESOP renewal application from George O'Day's Shop, Inc. relating to the operation of a facility for the Stripping and Repainting of Lockers and Towel Cabinets.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) Caustic Stripping and Rust Stop Application Station, identified as Building 5, constructed in 2001, with a maximum rate of 10.6 towel cabinets per hour, using no emissions control, and exhausting to the general vent.
- (b) One (1) Devilbiss spray paint booth, identified as Booth 1 (EU-01), constructed in 2001, with a maximum rate of 12.5 towel cabinets or 40 interior mechanisms per hour, using dry panel particulate filters for overspray control, and exhausting to stack S-1. An electric drying oven follows Booth 1 and exhausts to stack S-2.
- (c) One (1) TBI-Team Blowtherm spray paint booth, identified as Booth 2 (EU-02), constructed in 2001, with a maximum rate of 6.25 lockers per hour, using dry panel particulate filters for overspray control, and exhausting to stack S-3. Lockers are air-dried.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million BTU per hour:
 - i) 20 space heaters @ 0.085 million BTU per hour,
 - ii) 10 space heaters @ 0.200 million BTU per hour.

- (b) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment:
 - i) dry panel filters for Booth 1 changed as needed,
 - ii) dry panel filters for Booth 2 changed as needed.

Existing Approvals

The source has been operating under the previous FESOP (F089-12582-00459) issued on February 14, 2001, with an expiration date of February 14, 2006. There have been no amendments or revisions.

All conditions from the previous FESOP were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP renewal 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 administratively complete FESOP renewal application for the purposes of this review was received on May 2, 2005. Additional information was received on May 24, 2005.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emission calculations (three (3) pages).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	> 25
PM ₁₀	> 25
SO ₂	Negligible
VOC	> 25
CO	1.4
NO _x	1.6

HAPs	Unrestricted Potential Emissions (tons/yr)
Ethylene glycol monobutyl ethers	< 10
Other trace HAPs	< 5
Total	< 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of volatile organic compounds (VOC) are equal to or greater than twenty-five (25) tons per year in Lake County. Therefore, the source is subject to the provisions of 326 2-7. The source will be issued a FESOP because the source will limit its VOC emissions below the Title V levels.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not a major source of HAPs and will not need HAP limitations below the Title V levels.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) is not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Stripping and Rust Stop	neg	neg	-	*	-	-	1.14
EU-01 - Spray Booth 1	1.01	1.01	-	*	-	-	< 4.41
EU-02 - Spray Booth 2	1.79	1.79	-	*	-	-	< 6.72
Clean-up	-	-	-	*	-	-	neg
Total Emissions	2.80	2.80	-	< 25	-	-	< 25

*Pursuant to 326 IAC 2-8, total plant-wide VOC input has been limited to less than twenty-five (25) tons per year, so that Emission Offset (326 IAC 2-3) and the Part 70 Operating Permit Program (326 IAC 2-7) do not apply.

County Attainment Status

This source is located in Lake County.

Pollutant	Status
PM ₁₀	Attainment
PM _{2.5}	Nonattainment
SO ₂	Primary Nonattainment
NO ₂	Unclassifiable/Attainment
Ozone	Moderate Nonattainment under the 8-hr standard
Ozone	Severe Nonattainment under the 1-hr standard
CO	Unclassifiable/Attainment
Lead	Attainment

- (a) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as severe nonattainment for ozone under the 1-hr standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
- (c) Lake County has been classified as nonattainment for PM_{2.5}, and SO₂. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
- (d) Lake County has been classified as attainment or unclassifiable in Indiana 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, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Total controlled or otherwise limited emissions at this source:

Pollutant	Emissions (tons/yr)
PM	2.80
PM ₁₀	2.80
SO ₂	negligible
VOC	< 25
CO	1.4
NO _x	1.6
Single HAP	< 10
Combination HAPs	< 25

This existing source is not a major stationary source because VOCs in Lake County are limited to less than 25 tons per year, and it is not in one of the 28 listed source categories.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.
- (c) This source is not subject to the new National Emission Standard for Hazardous Air Pollutants for the Surface Coating of Miscellaneous Metal Parts and Products (NESHAP) (40 CFR Part 63, Subpart M) because it is not a major source of HAPs.

State Rule Applicability – Entire Source

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

This existing stationary source was initially constructed in 2001, after the August 7, 1977 rule applicability date, and it is not one of the 28 listed source categories. This source is not a major source for the purposes of PSD because it does not have the potential to emit two hundred and fifty (250) tons per year or more of a regulated pollutant for which Lake County is attainment or un-classifiable. There have not been any major modifications with increases of emissions significant enough to trigger applicability to this rule.

326 IAC 2-3 (Emission Offset)

- (a) This existing stationary source was initially constructed in 2001, after the August 7, 1977 rule applicability date, and it is not one of the 28 listed source categories. This source is not a major source for the purposes of Emission Offset because, pursuant to 326 IAC 2-8, the input of volatile organic compounds (VOC) has been limited to less than twenty-five (25) tons per year in an area classified as severe non-attainment for ozone (Lake County). There have not been any major modifications with increases of emissions significant enough to trigger applicability to this rule.
- (b) Lake County has been designated as non-attainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM_{2.5} Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM_{2.5} major NSR regulations, states should assume that a major stationary source's PM₁₀ emissions represent PM_{2.5} emissions. IDEM will use the PM₁₀ nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM_{2.5} NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit 100 tpy of any regulated pollutant. The George O'Day Shop does not have the potential to emit 100 tpy of PM₁₀. Therefore, assuming that PM₁₀ emissions represent PM_{2.5} emissions, 326 IAC 2-3 does not apply.

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

Input of hazardous air pollutants to this process are less than ten (10) tons per year of any single HAP and less than twenty-five (25) tons per year of any combination of HAPs; therefore, the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 2-6 (Emission Reporting)

This source, located in Lake County, does not emit volatile organic compounds (VOC) or oxides of nitrogen (NO_x) at levels equal to or greater than twenty-five (25) tons per year and it is not required to have an operating permit under 326 IAC 2-7 Part 70 Permit Program; therefore, it is not subject to 326 IAC 2-6 (Emission Reporting).

However, pursuant to the Hammond Ordinance No. 7102, the source will be required to submit an annual emission inventory containing the production information necessary to determine compliance and confirm the source classification and permit level. The emission inventory must be received by April 15th of each year. The submittal should cover the twelve (12) consecutive month time period starting January 1 and ending December 31. This is a local requirement only.

326 IAC 2-8 (Federally Enforceable State Operating Permit Program)

Pursuant to 326 IAC 2-8, the total input of VOC, including coatings, dilution solvents, and cleaning solvents shall be less than twenty-five (25) tons per 12 consecutive month period with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) and the Part 70 Operating Permit Program (326 IAC 2-7) not applicable.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability – Individual Facilities

326 IAC 2-1.1-10 (Local Agencies)

Spray Booths Particulates

Pursuant to 326 IAC 2-1.1-10(b), a local agency may set an emission limitation provided it does not conflict with the attainment or maintenance of an ambient air quality standard or does not assure compliance with an applicable requirement. The Hammond Department of Environmental Management chooses a "technology-based emission limit" for the spray booth particulates as defined in 326 2-7-1(39). This limitation is based on the source's physical potential to emit after controls as certified in their permit application. This limitation is more stringent than the minimum standards found in Title 326 of the Indiana Administrative Code.

The source will comply with the limitation by maintaining the control equipment as specified by the manufacturer, daily visual observations, daily pressure drop readings, and the record keeping or reporting necessary to demonstrate compliance with the requirements.

326 IAC 6-1 (Particulate Rules – County Specific Particulate Matter Limitations)

This rule for the limitation of particulate matter in specific counties of Indiana does not apply to this source because, although it is located in Lake County, it is not specifically listed in sections 8.1 through 18 and it does not have the potential to emit of one hundred (100) tons or more of particulate matter per year.

326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies)

Pursuant to 326 IAC 6-3-2(a), this surface coating operation is subject to the work practices contained in subsection (d) and is not required to calculate emission limitations according to subsection (e). Pursuant to subsection (d), a surface coating operation shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and shall operate the control device in accordance with manufacturer's specifications. Pursuant to subdivision (3) of subsection (d), sources that operate according to a valid permit pursuant to 326 IAC 2-8, are exempt from the work practices in subdivision (2) of subsection (d).

326 IAC 8-2-9 (Miscellaneous Metal Coating) Spray Booths VOCs

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to a coating applicator in a coating application system shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for an air dried or forced warm air dried system.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS and calculations submitted by the source and reviewed by this Department, the coatings used at this source are in compliance with this requirement.

Testing Requirements

The input of volatile organic compounds (VOC) to this process is limited to less than twenty-five (25) tons per year. Record keeping and reporting requirements are sufficient to verify compliance with this limitation. Therefore, testing, other than that required by 326 IAC 8-2-9 for VOC content of coatings, will not be required.

Compliance Requirements

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

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

The spray paint booths known as Booth 1 and Booth 2 and their associated dry panel particulate filters have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S-1 and S-3) while the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from each stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (d) A twelve-month rolling total of VOC emissions, based on the total gallons of coatings and clean-up solvents used, shall be calculated on a monthly basis and submitted quarterly to HDEM and IDEM-OAQ, Compliance Section, on the forms provided or equivalent forms approved by IDEM, OAQ or HDEM.

These monitoring conditions are necessary to ensure compliance with following operating permit.

Conclusion

The operation of this Locker and Towel Cabinet Stripping and Repainting Facility shall be subject to the conditions of the attached proposed Federally Enforceable State Operating Permit (FESOP) **F089-21178-00459**.

Calculations based on 8760 hours - Normal hours 16/5/50 (4000)

Step 1 Cabinets & Inside Mechanisms (General Vent)
 stripping

Coating	units/hr	gals/unit	lbs VOC/gal (-water)	lbs VOC/hr	TPY	Worst Case (tons/yr)
Rust Buster	10.6	0.0049	3.23	0.168	0.735	<u>0.735</u>
308E	10.6	0.001	8.62	0.091	0.400	<u>0.400</u>

Step 2 Cabinets & Inside Mechanisms (Booth 1) (S-1)
 painting

Cabinets-white enamel	12.5	0.064	3.35	2.680	11.738	MDR is 12.5 Cabinets or 40 inside mechanisms, not both, so worst case is: <u>11.738</u>
Mechanisms-gray enamel	40	0.013	3.19	1.659	7.266	

Step 3 Drying Oven (S-2)
 drying

Drying Oven (0.123 MMBtu/hr) is electric. VOCs from drying are accounted for at stack (S-1) above where the coating is applied.

Step 4 Lockers (Booth 2) (S-3)
 painting

Locker-gray enamel	6.25	0.342	3.15	6.733	29.491	MDR is 6.25 lockers/hr with either gray or beige, not both, so worst case is: <u>29.491</u>
New Locker- beige enamel	6.25	0.342	3.11	6.648	29.117	

Step 5 Clean-up (General Vent)

	gal/yr	lbs/gal	lbs/yr	TPY
Mineral Spirits MS 66/3	1600	6.476	10361.60	5.181

PTE	VOC	47.55	TPY
------------	------------	--------------	------------

Stripping & Repainting Lockers and Towel Cabinets

HAP Emissions

Calculations are based on the weight percent (%) of HAPs in the coatings

	units/hr	gals/unit	gal/hr	density	lbs/hr	lbs/yr	wt. % HAP	lbs/yr HAPs	TPY HAPs
Cabinet Stripping									
Rust Buster	10.6	0.005	0.052	12.91	0.67	5874	25%	1468	0.73
Add 308E	10.6	0.001	0.011	9.58	0.10	890	90%	801	0.40
Cabinet/Mech Booth									
Cabinets-white enamel	12.5	0.064	0.800	10.92	8.74	76527	11.52%	8816	4.41
Mechanisms-gray enamel	40	0.013	0.520	9.57	4.98	43593	7.78%	3392	-
Locker Booth									
Locker-gray enamel	6.25	0.342	2.138	9.49	20.28	177696	7.39%	13132	-
New Locker- beige enamel	6.25	0.342	2.138	9.75	20.84	182564	7.36%	13437	6.72
Clean-up glycol ethers and red line wash have been replaced with Mineral Spirits 66/3 - no HAPs									
Clean-up								Total HAPs	12.26
Mineral Spirits									
MS - 66/3									

Clean-up negligible

PTE HAPs
< 6.25 TPY

Total HAPs are less than 25% of the limited potential to emit of VOC =

Stripping & Repainting Lockers and Towel Cabinets

Particulate Emissions

Step 1	Cabinets & Inside Mechanisms (General Vent)	Paint Solids (1-wgt% total VOC)	Air Atomization transfer efficiency (TE) (50%)	Dry (Panel) Filters Overspray Control (90%)
308E	not applicable - items are dipped into caustic strip solution			
Rust Buster	not applicable - rust buster is hand applied			
	PM lbs/hr = (lbs/gal) x (1-w%VOC) x (units/hr) x (gals/unit) x (1-TE)			TPY = lbs/hr x 8760/2000
Coating	lbs/gal	wgt % total VOC	transfer efficiency	particulates before control lbs/hr TPY
Step 2	Cabinets & Inside Mechanisms (Booth 1)	(S-1)		
painting				
Cabinets-white enamel	10.92	47.20%	50%	2.306 10.102
Mechanisms-gray enamel	9.57	66.90%	50%	0.824 3.607
				MDR is 12.5 Cabinets or 40 inside mechanisms, not both, so worst case is: 10.10
Step 3	Drying Oven (S-2)			
drying	electric drying oven - negligible particulates			
				HAQC #7102 - Emission limit = lbs/hr x (1-CE) Booth 1 2.3 x (1-0.9) = 0.23 lbs/hr after control Booth 2 4.1 x (1-0.9) = 0.41 lbs/hr after control
Step 4	Lockers (Booth 2)	(S-3)		
painting				
Locker-gray enamel	9.49	63.27%	50%	3.725 16.317
New Locker- beige enamel	9.75	60.73%	50%	4.092 17.923
				MDR is 6.25 lockers/hr with either gray or beige, not both, so worst case is: 17.92
Step 5	Clean-up (General Vent)			
Mineral Spirits	no particulates from mineral spirits			
Air Atomization transfer efficiency flat surface (TE) (50%)				
Dry (Panel) Filters Overspray Control (90%)				
PM lbs/hr = (lbs/gal) x (1-w%VOC) x (units/hr) x (gals/unit) x (1-TE)				

Particulates	
PTE Before Controls	28.02 TPY
PTE After Controls (90% CE)	2.80 TPY

All particulates are considered PM10 unless demonstrated to be otherwise

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

and

**Hammond Department of Environmental Management
-Air Pollution Control Division-**

Addendum to the Technical Support Document for a
Renewal of a Federally Enforceable State Operating Permit (FESOP)

Source Name:	George O'Day's Shop, Inc.
Source Address:	19 – 143 rd Street, Hammond, Indiana 46327
County:	Lake
SIC Code:	3479 – Stripping and Repainting Lockers and Towel Cabinets
FESOP Renewal No.:	F089-21178-00459
Permit Reviewer:	Ronald Holder

On July 25, 2005, the Hammond Department of Environmental Management (HDEM) had a notice published in the Hammond Times, Hammond, Indiana, stating that George O'Day's Shop, Inc. had applied for a renewal of their Federally Enforceable State Operating Permit (FESOP) for a stripping and repainting operation for lockers and towel cabinets. The notice also stated that HDEM proposed to issue the FESOP renewal 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 comment on whether or not this permit should be issued as proposed.

Upon further review, the HDEM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. On page 3 of 31, in the Table of Contents, Condition C.17, **No.** was added as follows in between the word Ordinance and the number 7102 in order to be consistent with Section C in the permit:

C.17 Annual Emission Inventory [Hammond Ordinance **No.** 7102]

2. On page 4 of 31, in Section A.2, and page 23 of 31, in Section D.1, the installation dates of the emission units were corrected from 2001 to 2004 because the fire suppression equipment required by the local Fire Department delayed the completion of the installation:
 - (a) One (1) Caustic Stripping and Rust Stop Application Station, identified as Building 5, constructed in ~~2004~~ **2004**, with a maximum rate of 10.6 towel cabinets per hour, using no emissions control, and exhausting to the general vent.
 - (b) One (1) Devilbiss spray paint booth, identified as Booth 1 (EU-01), constructed in ~~2004~~ **2004**, with a maximum rate of 12.5 towel cabinets or 40 interior mechanisms per hour, using dry panel particulate filters for overspray control, and exhausting to stack S-1. An electric drying oven follows Booth 1 and exhausts to stack S-2.
 - (c) One (1) TBI-Team Blowtherm spray paint booth, identified as Booth 2 (EU-02), constructed in ~~2004~~ **2004**, with a maximum rate of 6.25 lockers per hour, using dry panel particulate filters for overspray control, and exhausting to stack S-3. Lockers are air-dried.

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.