



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: June 14, 2007
RE: The New York Blower Company / 091-21675-00056
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot 03/23/06



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**The New York Blower Company
171 Factory Street
LaPorte, Indiana 46350**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions.

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.

Operation Permit No.: F091-21675-00056	
Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: June 14, 2007 Expiration Date: June 14, 2012

TABLE OF CONTENTS

A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]	
A.3	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.4	Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(l)]	
A.5	FESOP Applicability [326 IAC 2-8-2]	
B	GENERAL CONDITIONS.....	8
B.1	Definitions [326 IAC 2-8-1]	
B.2	Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6]	
B.5	Severability [326 IAC 2-8-4(4)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8	Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.12	Emergency Provisions [326 IAC 2-8-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16	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.17	Permit Renewal [326 IAC 2-8-3(h)]	
B.18	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.19	Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.20	Source Modification Requirement [326 IAC 2-8-11.1]	
B.21	Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2] [IC 13-30-3-1]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.23	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.24	Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
C	SOURCE OPERATION CONDITIONS.....	17
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Stack Height [326 IAC 1-7]	
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 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(a)(1)]

- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.15 Response to Excursions or Exceedances [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 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 EMISSIONS UNIT OPERATION CONDITIONS.....23

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

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
- D.1.2 FESOP Minor Limits [326 IAC 2-8]
- D.1.3 Particulate Emissions Limitations, Work Practices and Control Technologies (Surface Coating) [326 IAC 6-3-2(d)]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.5 Volatile Organic Compounds (VOC)

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

- D.1.6 Monitoring

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

- D.1.7 Record Keeping Requirement
- D.1.8 Reporting Requirements

D.2 EMISSIONS UNIT OPERATION CONDITIONS.....26

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

- D.2.1 FESOP Minor Limits [326 IAC 2-8]
- D.2.2 Hazardous Air Pollutants (HAPs)

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

- D.2.3 Record Keeping Requirements
- D.2.4 Reporting Requirements

D.3 EMISSIONS UNIT OPERATION CONDITIONS.....28

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

- D.3.1 Particulate Emissions from Manufacturing Processes [326 IAC 6-3-2(e)]
- D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.3.3 Particulate Emissions [326 IAC 2-7-6(6)]

Certification Form29
Emergency Occurrence Form..... 30
FESOP Quarterly Usage Report Form 32
FESOP Quarterly Usage Report Form 33
Quarterly Deviation and Compliance Monitoring Report Form.....34
Quarterly Deviation and Compliance Monitoring Report Form..... 35

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary metal and fiberglass air moving equipment manufacturing source.

Source Address:	171 Factory Street, LaPorte, Indiana 46350
Mailing Address:	171 Factory Street, LaPorte, Indiana 46350
General Source Phone Number:	219-325-6448
SIC Code:	3564
County Location:	LaPorte
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

This metal and fiberglass air moving equipment manufacturing source consists of four (4) plants located on contiguous properties, having the same SIC codes, owned by one (1) company, and functioning as a single source. Therefore, they are considered one (1) source.

A.3 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) Six (6) paint booths, identified as S1, S2, S3, S4, S7 and S8, constructed before 1980, equipped with air atomization spray guns and dry filters as overspray control, exhausting to stacks S1, S2, S3, S4, S7 and S8, respectively.
- (b) Two (2) paint booths, identified as S5 and S6, constructed before 1980, equipped with high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stacks S5 and S6, respectively.
- (c) One (1) paint booth, identified as S9, constructed after 1980, equipped with air atomization spray guns and dry filters as overspray control, exhausting to stack S9, respectively.
- (d) One (1) fiberglass spray booth, identified as S11, constructed before 1980, equipped with flow coaters and dry filters as overspray control, exhausting to stack S11.
- (e) One (1) fiberglass booth for hand cleaning molds with acetone, gel coat repair application using cup guns, and graphite application, identified as S12, constructed before 1980, equipped with dry filters as overspray control, exhausting to stack S12.
- (f) One shot blast unit, constructed in 2002, with a maximum nozzle pressure of 100 psi, inside nozzle diameter of 7/8 inch, capable of using a maximum of 3,360 pounds of abrasive per hour, controlled by a dust collector.

A.4 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:

- (a) Combustion related activities, including space heaters, process heaters heat treat furnaces, or boilers using natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

- (1) Plant 1 - Natural gas units

No. of Units	Emission Unit	Capacity (MMBtu per hour each)
3	Rapid Air Units	4.95
1	Reznor MUA	0.4
2	Phosphate pressure wash units	0.32
2	Loading Dock Heaters	1.0
1	Heaters	0.104
1	Heaters	0.084
3	Heaters	0.06
3	Heaters	0.108

- (2) Plant 2 - Natural gas units

No. of Units	Emission Unit	Capacity (MMBtu per hour each)
5	Heaters	0.084
1	Heater	0.28
2	Heaters	0.104
1	Heater	0.4
1	Heater	1.0
1	Air Makeup Unit	0.3465
1	Air Makeup Unit	0.2475
1	Air Makeup Unit	0.495
1	Air Makeup Unit	0.66
1	Air Makeup Unit	2.2

- (3) Plant 3 - Natural gas units

No. of Units	Emission Unit	Capacity (MMBtu per hour each)
1	MUA Unit	5.4
1	MUA Unit	3.025
1	Phosphate Pressure Wash Unit	0.320
1	Heater	0.179
1	Heater	0.2
1	Heater	0.166
1	Heater	0.202

- (4) Plant 4 - Natural gas units

No. of Units	Emission Unit	Capacity (MMBtu per hour each)
1	MUA Unit	5.5
1	MUA Unit	3.3
1	Wash Unit	2.0

1	Curing Oven	2.4
1	Drying Oven	2.4
1	Curing System	2.4
1	Wash Unit	0.32

- (b) Welding units' capacity: 0.018 tons of electrode per hour.
- (c) One (1) electrostatic closed loop powder spray booth, capacity: 15.3 pounds of powder coat per hour.

A.5 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) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 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.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, 091-21675-00056, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

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

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

B.5 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.6 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.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

B.8 Certification [326 IAC 2-8-3(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.9 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 no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ 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.11 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) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 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 describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267.

and

Northwest Regional Office
8315 Virginia St., Ste. 1
Merrillville, Indiana 46410

- (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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notice fulfills the requirement of 326 IAC 2-8-4(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 an "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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 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.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 091-21675-00056 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted
- (b) All previous registrations and permits are superseded by this permit.

B.14 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.15 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 Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "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.16 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 Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "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 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 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 at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 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 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 an "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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "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.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

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

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

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

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(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.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, 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.22 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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "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.23 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.24 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

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

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

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

C.2 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 of PM₁₀ from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

(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 that 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.3 Opacity [326 IAC 5-1]

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

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

C.4 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.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers

and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "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 an "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 not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.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 within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment

and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

Unless otherwise specified in the approval for the new emission unit(s), 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 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the 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 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

- (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][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, 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 an "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 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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 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 an "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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "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.
- (f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.19 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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Six (6) paint booths, identified as S1, S2, S3, S4, S7 and S8, constructed before 1980, equipped with air atomization spray guns and dry filters as overspray control, exhausting to stacks S1, S2, S3, S4, S7 and S8, respectively.
- (b) Two (2) paint booths, identified as S5 and S6, constructed before 1980, equipped with high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stacks S5 and S6, respectively.
- (c) One (1) paint booth, identified as S9, constructed after 1980, equipped with air atomization spray guns and dry filters as overspray control, exhausting to stack S9, respectively.

(The information describing the process contained in this emissions unit 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) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to metal products at the one (1) paint booth, identified as S9, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for air dried and forced warm air dried coatings.
- (b) 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.

D.1.2 FESOP Minor Limits [326 IAC 2-8]

- (a) The amount of any single hazardous air pollutant (HAP) delivered to the paint applicators, plus the amount of that same HAP used for clean up, plus the amount of that same HAP used by all other facilities at this source shall be less than 10 tons per consecutive twelve (12) month period.
- (b) The total amount of HAPs delivered to the paint applicators plus the amount of any combination of HAPs used for cleanup together with HAPs used in Condition D.2.1 (b) shall be less than 24 tons per consecutive twelve (12) month period.

The above HAP limits in combination with the HAPs limits in Condition D.2.1 and HAPs emissions from insignificant activities shall keep the any individual HAP from the entire source to less than 10 tons and total HAPs from the entire source to less than 25 tons per year and will render 326 IAC 2-7 not applicable.

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

Pursuant to 326 IAC 6-3-2(d), the Permittee shall operate the control devices at all times the paint booths are in operation according to manufacturer's instructions.

D.1.4 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 control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

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) using formulation data supplied by the coating manufacturer.

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

D.1.6 Monitoring

- (a) Daily inspections and manometer readings of the primary filters shall be performed to verify the placement, integrity and particle loading of the filters. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) A manometer reading of the secondary redundant filter system behind each primary filter system at each booth shall be recorded during each primary filter change to ensure that there is no overspray on the rooftops.
- (c) Inspections shall be performed of the particulate emissions from the stacks and the presence of overspray on the rooftops and the nearby ground each time a maintenance employee goes onto a building rooftop, and no less than once per quarter. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.7 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 (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.1.1 and D.1.2.
 - (1) The amount of paint and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month; and
 - (4) The total VOC and HAP usage for each month.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of overspray observations, daily inspections and manometer readings.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (d) One (1) fiberglass spray booth, identified as S11, constructed before 1980, equipped with flow coaters and dry filters as overspray control, exhausting to stack S11.
- (e) One (1) fiberglass booth for hand cleaning molds with acetone, gel coat repair application using cup guns, and graphite application, identified as S12, constructed before 1980, equipped with dry filters as overspray control, exhausting to stack S12.

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

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

D.2.1 FESOP Minor Limits [326 IAC 2-8]

- (a) The amount of any single hazardous air pollutant (HAP) used in the fiberglass booths, plus the amount of that same HAP used for clean up, plus the amount of that same HAP used by all other facilities at this source shall be less than 10 tons per consecutive twelve (12) month period.
- (b) The total amount of hazardous air pollutants (HAPs) used in the fiberglass booths, the wetting agent, release agent and cleanup, together with the HAPs used in D.1.2 shall be less than 24 tons per consecutive twelve (12) month period.

The above HAPs limits in combination with the HAPs limits in Condition D.1.2 and the HAPs emissions from insignificant activities shall keep any individual HAP from the entire source to less than 10 tons, and total HAPs from the entire source to less than 25 tons per year and will render 326 IAC 2-7 not applicable.

Compliance Determination Requirements

D.2.2 Hazardous Air Pollutants (HAPs)

Compliance with the HAP content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

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

D.2.3 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Conditions D.2.1.
 - (1) The HAPs content of each resin, wetting agent, release agent and cleanup used for fiberglass booths.
 - (2) The resin, wetting agent and release agent usage for each month in gallons per month. Said records shall be sufficient to show compliance and may include purchase orders, invoices, certificates of analysis, inventories, material safety data sheets (MSDS) as necessary to verify type and amount of material used.
 - (3) The total HAPs usage for each month for the fiberglass booths.

- (4) The weight of total HAPs emitted for the fiberglass booths for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (f) One shot blast unit, constructed in 2002, with a maximum nozzle pressure of 100 psi, inside nozzle diameter of 7/8 inch, capable of using a maximum of 3,360 pounds of abrasive per hour, controlled by a dust collector.

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

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

D.3.1 Particulate Emissions from Manufacturing Processes [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2(e) the particulate emissions from the shot blast unit shall not exceed 5.8 pounds per hour when operating at a process weight rate of 3,360 pounds per hour. The particulate emission limit shall be calculated using the following formula:

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

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

D.3.2 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 shot blast unit and control devices.

Compliance Determination Requirements

D.3.3 Particulate Emissions [326 IAC 2-7-6(6)]

- (a) The dust collector for particulate control shall be in operation at all times that the shot blast unit is in operation, in order to comply with Condition D.3.1.
- (b) In the event that filter failure is observed in a multi-compartment dust collector, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

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

Source Name: New York Blower Company
Source Address: 171 Factory Street, LaPorte, Indiana 46350
Mailing Address: 171 Factory Street, LaPorte, IN 46350
FESOP Permit No.: F091-21675-00056

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 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

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

Source Name: New York Blower Company
Source Address: 171 Factory Street, LaPorte, Indiana 46350
Mailing Address: 171 Factory Street, LaPorte, IN 46350
FESOP Permit No.: F091-21675-00056

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), 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**

**FESOP Usage Report
Quarterly**

Source Name: New York Blower Company
Source Address: 171 Factory Street, LaPorte, Indiana 46350
Mailing Address: 171 Factory Street, LaPorte, IN 46350
FESOP Permit No.: F091-21675-00056
Facility: Two (2) Fiberglass Booths, nine (9) paint booths, powder coating, combustion and welding
Parameter: Individual HAP
Limit: Less than 10 tons of a single HAP per twelve (12) consecutive month period.

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**

**FESOP Usage Report
 Quarterly**

Source Name: New York Blower Company
 Source Address: 171 Factory Street, LaPorte, Indiana 46350
 Mailing Address: 171 Factory Street, LaPorte, IN 46350
 FESOP Permit No.: F091-21675-00056
 Facility: Nine (9) Paint Booths and two (2) Fiberglass Booths
 Parameter: Combination of HAPs
 Limit: Less than 24 tons total of HAPS from the paint booths and fiberglass booths per twelve (12) consecutive month period.

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

Source Name: New York Blower Company
Source Address: 171 Factory Street, LaPorte, Indiana 46350
Mailing Address: 171 Factory Street, LaPorte, IN 46350
FESOP Permit No.: F091-21675-00056

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.

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

**Addendum to the
Technical Support Document (TSD) for a Part 70 Operating Permit Renewal**

Source Name:	The New York Blower Company
Source Location:	171 Factory Street, La Porte, Indiana 46350
County:	La Porte
SIC Code:	3564
Permit Renewal No.:	F 091-21675-00056
Permit Reviewer:	Timothy R. Pettifor

On March 29, 2007, the Office of Air Quality (OAQ) had a notice published in the La Porte Herald-Argus, La Porte, Indiana, stating that The New York Blower Company had applied for a Federally Enforceable State Operating Permit (FESOP) renewal to continue to operate a metal and fiberglass air moving equipment manufacturing source. The notice also stated that OAQ proposed to issue a FESOP renewal for this operation and provided information on how the public could review the proposed FESOP renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP renewal should be issued as proposed.

On May 29, 2007, Byron L. Taylor of The New York Blower Company submitted comments on the proposed FESOP renewal. The comments are as follows: the permit language if changed, has deleted language as ~~strikeouts~~ and the new language **bolded**.

Comment 1 Page 5 Section A.3 and Page 6 Section A.4

The word "between" should be removed from Section A.3 (b). In addition, the capacity of the last item in Section A.4 (a) (1), Plant 1-Natural Gas Units is incorrect. The capacity for these heaters should read 0.108 rather than 0.168 MMBtu per hour each.

Response 1: The word "between" has been removed from Section A.3 (b). This section now reads as follows:

- (b) Two (2) paint booths, identified as S5 and S6, constructed ~~between~~ before 1980, equipped with high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stacks S5 and S6, respectively.

Section A.4 (a) (1) has been amended to reflect the correct capacity. This section now reads as follows:

A.4 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:

- (a) Combustion related activities, including space heaters, process heaters heat treat furnaces, or boilers using natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

(1) Plant 1 - Natural gas units

No. of Units	Emission Unit	Capacity (MMBtu per hour each)
3	Rapid Air Units	4.95
1	Reznor MUA	0.4
2	Phosphate pressure wash units	0.32
2	Loading Dock Heaters	1.0
1	Heaters	0.104
1	Heaters	0.084
3	Heaters	0.06
3	Heaters	0.168 0.108

Comment 2 Page 28 Condition D.3.4 and Page 29 Conditions D.3.5, D.3.6, and D.3.7

The shot blast unit in the Plant 3 building discussed in Condition D.3.4 (a) does not have a stack to observe. The filter system exhausts to the inside of the building. In the event of any mechanical or filter failures this machine would not run. It would shut down automatically. If the pressure drop or system failures described in Conditions D.3.5 and D.3.6 were to occur, the system would shutdown automatically and there would be no reading to observe. I'm also not sure how the observation in Condition D.3.7 (a) can be made because there is no outside stack to observe. The pressure drop we are to record in Condition D.3.7 (b) would shut the machine down automatically. We would be unable to restart the system or take pressure readings until it is repaired.

Response 2: Since the filter system exhausts inside the building, IDEM agrees to delete Conditions D.3.4, D.3.5, D.3.6, and D.3.7.

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

~~D.3.4 Visible Emissions Notations~~

- ~~(a) Visible emission notations of the shot blast unit stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- ~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(e) If abnormal emissions is are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.~~

~~D.3.5 Dust Collector Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~

~~(a) The Permittee shall record the pressure drop across the dust collector used in conjunction with the shot blast unit at least once per day when the shot blast is in operation. When for any one reading, the pressure drop across the dust collector is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.~~

~~D.3.6 Broken or Failed Filter Detection [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~

~~(a) For a single compartment dust collector controlling emissions from a process operated continuously a failed units and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

~~(b) For a single compartment dust collector controlling emissions from a batch process the feed to the process shall be shut down immediately until the failed units has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the shot blast unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

~~Filter failure can be indicated by a significant drop in the dust collector pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or tribeflows.~~

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

~~D.3.7 Record Keeping Requirements~~

~~(a) To document compliance with Condition D.3.4, the Permittee shall maintain records of the once per day visible emission notations.~~

~~(b) To document compliance with Condition D.3.5, the Permittee shall maintain records of the once per day of the pressure drop.~~

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

Comment 3 Pages 33 and 34 FESOP Usage Reports

Why are the reports on pages 33 and 34 (FESOP Usage Reports) changed from the format used in all our previous permits?

Response 3: The previous forms reflected a VOC limit of no more than 25 tons per twelve consecutive month period. This limit was necessary because the uncontrolled VOC emissions were more than 100 tons per year. This limit is no longer necessary since the unrestricted

potential to emit VOC is 75.37 tons per year which is less than the major source level for Part 70. Therefore, the forms have been updated. The permit is not revised as a result of this comment.

Comment 4 Page 9 of the Technical Support Document (TSD) under Compliance Requirements

The new weekly requirement listed under Compliance Requirements on page 9 of the Technical Support Document was relieved in all our past permits by having a redundant secondary filter system in each spray booth and making the quarterly observation described in the next section: "At least once quarterly". To make new weekly observations would require people to go onto the roofs of each of our buildings once each week and this would be very dangerous. Please see pages 26 and 27, Conditions D.2.4 (a), (b), and (c) for a complete explanation of the current procedures. Please remove this new weekly monitoring from the Technical Support Document to make it consistent with the rest of the draft permit and our past permits.

Response 4: The weekly requirement on page 9 of the Technical Support Document (TSD) was an error. There was also an error the previous permit, F 091-13638-00056. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result, ensuring that these types of concerns are documented and part of the record regarding this permit decision. Condition D.1.6 (a) has been revised to delete the weekly requirement and now reads as follows:

D.1.6 Monitoring

- (a) Daily inspections and manometer readings of the primary filters shall be performed to verify the placement, integrity and particle loading of the filters. ~~To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S1 through S9, while one or more of the booths are in operation.~~ If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Comment 5 Page 12 of Appendix A of the Technical Support Document.

Why were the emission efficiencies on page 12 of Appendix A of the Technical Support Document (Emissions Calculations Shot Blast Unit) changed from .999 to .85?

Response 5: A conservative value of .85 was used for the control efficiency calculations on page 12 of Appendix A of the Technical Support Document. In order to use the higher value of .999, IDEM would have to require additional testing of the shot blast unit.

Upon further review IDEM, OAQ has made the following changes to the Part 70 permit.

1. The transfer efficiencies of the Resin Layup - Hetron R (Flow Coat) and the Resin Layup-Derakane R (Flow Coat) should equal 100%. Consequently, no PM/PM10 emissions are generated in these processes (see Addendum to Appendix A pages 1-3). The Unrestricted Potential Emissions are now revised as follows:

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	167.03 103.13
PM ₁₀	160.19 96.29
SO ₂	0.15
VOC	75.37
CO	21.0
NO _x	25.0

The Potential to emit after issuance has also been revised as follows:

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Paint Booths	6.44	6.44	-	60.4	-	-	<14
Fiberglass	9.58 0.0	9.58 0.0	-	13.63	-	-	<10
Powder Coating	0.67	0.67	-	-	-	-	0.134
Shot Blast	8.83	7.59	-	-	-	-	-
NG Combustion	0.48	1.90	0.15	1.37	21.00	25.00	0.47
Welding	0.224	0.224	-	-	-	-	0.08
Single HAP	-	-	-	-	-	-	<10
Total Emissions	26.22 16.64	26.40 16.82	0.15	75.37	21.00	25.00	<25

2. Pursuant to 326 IAC 6-3-1 (b) (7), the flow coating processes are exempt from the provisions of 326 IAC 6-3, Conditions D.2.2, D.2.3, D.2.4, and D.2.5 (b) are deleted.

~~D.2.2 Particulate Emissions Limitations, Work Practices and Control Technologies (Surface Coating) [326 IAC 6-3-2(d)]~~

~~Pursuant to 326 IAC 6-3-2(d), the Permittee shall operate the control devices at all times the fiberglass booths are in operation according to manufacturer's instructions.~~

~~D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]~~

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

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

~~D.2.4 Monitoring~~

~~(a) Daily inspections and manometer readings 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 fiberglass booth stacks S11 and S12, while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C Response to Excursions or Exceedances. Failure to take response steps in accordance with~~

~~Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.~~

~~(b) A manometer reading of the secondary redundant filter system behind each primary filter system and at each booth shall be recorded during each primary filter change to ensure that there is no overspray on the rooftops.~~

~~(c) Inspections shall be performed of the particulate emissions from the stacks and the presence of overspray on the rooftops and the nearby ground each time a maintenance employee goes onto a building rooftop, and no less than once per quarter. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.~~

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

D.2-53 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Conditions D.2.1.

- (1) The HAPs content of each resin, wetting agent, release agent and cleanup used for fiberglass booths.
- (2) The resin, wetting agent and release agent usage for each month in gallons per month. Said records shall be sufficient to show compliance and may include purchase orders, invoices, certificates of analysis, inventories, material safety data sheets (MSDS) as necessary to verify type and amount of material used.
- (3) The total HAPs usage for each month for the fiberglass booths.
- (4) The weight of total HAPs emitted for the fiberglass booths for each compliance period.

~~(b) To document compliance with Condition D.2.4, the Permittee shall maintain a log of overspray observations, daily and quarterly inspections and manometer readings.~~

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

3. A Compliance Determination Requirement, Condition D.2.2 has been included in Section D.2. as follows:

Compliance Determination Requirements

D.2.2 Hazardous Air Pollutants (HAPs)

Compliance with the HAP content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

4. All occurrences of IDEM's mailing addresses have been updated in the permit. All addresses have been revised to include a mail code (MC) as follows:

Asbestos Section:	MC 61-52 IGCN 1003
Compliance Section:	MC 61-53 IGCN 1003
Compliance Data Section:	MC 61-53 IGCN 1003
Permits Branch:	MC 61-53 IGCN 1003

5. A typographical error in Condition D.1.2 is corrected as shown below.

D.1.2 FESOP Minor Limits [326 IAC 2-8]

(a) The amount of any single hazardous air pollutant (HAP) delivered to the paint applicators, plus the amount of that same HAP used for clean up, plus the amount of that same HAP used by all other facilities at this source shall be less than 10 tons per consecutive twelve (12) month period.

~~(e)~~(b) The total amount of HAPs delivered to the paint applicators plus the amount of any combination of HAPs used for cleanup together with HAPs used in Condition D.2.1 (b) shall be less than 24 tons per consecutive twelve (12) month period.

6. A grammatical change is made to Condition D.1.6 (b) as shown below.

D.1.6 Monitoring

(b) A manometer reading of the secondary redundant filter system behind each primary filter system and at each booth shall be recorded during each primary filter change to ensure that there is no overspray on the rooftops.

Addendum to Appendix A: Emissions Calculations

Emission Summary

Company Name: New York Blower Company
Address City IN Zip: 171 Factory Street, La Porte, Indiana 46350
Permit Number: F091-21675-00056
Permit Reviwer: GMM/TP

Uncontrolled Potential Emissions (tons/year)							
Emissions Generating Activity							
Pollutant	Paint Booths	Fiberglass	Powder Coating	Shot Blast	NG Combustion	Welding	TOTAL
	PM	42.90	63.90	0.67	58.86	0.48	
PM10	42.90	63.90	0.67	50.60	1.90	0.224	460.49 96.29
SO2					0.15		0.15
NOx					25.00		25.00
VOC	60.4	13.63			1.37		75.40
CO					21.00		21.00

Uncontrolled HAPS Emissions (tons/year)

Pollutant	Paint Booths	Fiberglass	Powder Coating	NG Combustion	Welding	Total
Xylene	37.38					37.38
Toluene	2.74E-04			8.50E-04		1.12E-03
Ethyl Benzene	5.11					5.11
Benzene	0.04			5.25E-04		4.05E-02
MIBK	9.78					9.78
Cobalt Compounds	2.04					2.04
Dibutyl Phthalate	4.8					4.8
Aliphatic Polyisocynate	0.59					0.59
Styrene		13.4				13.4
Antimony Compounds			0.134			0.134
Nickel				5.25E-04	0.032	3.25E-02
Dichlorobenzene				3.00E-04		0.0003
Formaldehyde				1.87E-02		1.87E-02
Hexane				4.50E-01		0.45
Lead				1.25E-04		1.25E-04
Cadmium				2.75E-04		2.75E-04
Chromium				3.50E-04	0.032	3.24E-02
Manganese				9.50E-05	0.016	1.61E-02
Total						73.83

Total emissions based on rated capacity at 8,760 hours/year.

Worst Case HAPs (Sum of worst case HAPs of primers, urethane enamels, water reducible enamels, aerosol, enamels and solvent)

Controlled Potential Emissions (tons/year)							
Emissions Generating Activity							
Pollutant	Paint	Fiberglass	Powder Coating	Shot Blast	NG	Welding	TOTAL
	Booths				Combustion		
PM	6.44	9.58	0.67	8.83	0.48	0.224	26.22 16.64
PM10	6.44	9.58	0.67	7.59	1.90	0.224	26.40 16.82
SO2					0.15		0.15
NOx					25.00		25.00
VOC	60.4	13.63			1.37		75.40
CO					21.00		21.00

Controlled HAPs Emissions (tons/year)

Pollutant	Paint Booths	Fiberglass	Powder Coating	NG Combustion	Welding	Total Single HAP
Xylene	<10					<10
Toluene	2.74E-04			8.50E-04		1.12E-03
Ethyl Benzene	5.11					5.11
Benzene	0.04			5.25E-04		4.05E-02
MIBK	<10					<10
Cobalt Compounds	2.04					2.04
Dibutyl Phthalate	4.8					4.8
Aliphatic Polyisocyanate	0.59					0.59
Styrene		<10				<10
Antimony Compounds			0.134			0.134
Nickel				5.25E-04	0.032	3.25E-02
Dichlorobenzene				3.00E-04		0.0003
Formaldehyde				1.87E-02		1.87E-02
Hexane				4.50E-01		0.45
Lead				1.25E-04		1.25E-04
Cadmium				2.75E-04		2.75E-04
Chromium				3.50E-04	0.032	3.24E-02
Manganese				9.50E-05	0.016	1.61E-02
Limited Totals	<14	<10	0.134	0.47	0.08	

Total emissions based on rated capacity at 8,760 hours/year.

Total Combination of HAPs <25

Worst Case HAPs (Sum of worst case HAPs of primers, urethane enamels, water reducible enamels, aerosol, enamels and solvent)

**Addendum to Appendix A: Emissions Calculations
VOC and Particulate
Reinforced Plastics and Composites**

Company Name: The New York Blower Company
Address City IN Zip: 171 Factory Street, La Porte, Indiana 46350
FESOP: F 091-21675-00056
Reviewer: GMM/TP

Material (Application Method)	Density (lb/gal)	Weight % Monomer VOC	CFA Unified Emission Factor (lbs/ton)	Gallons per unit	Units per hour	Pounds VOC per hour	Pounds VOC per day	VOC tons/year	PM/PM10- tons/yr	Transfer Efficiency	
Resin Layup - Hetrion R (Flow Coat)											
Styrene	10.45	28.0%	59.92	11.37	0.42	1.50	35.88	6.55	39.34 0.00	75.00% 100.00%	
Resin Layup - Derakane R (Flow Coat)											
Styrene	9.09	38.0%	86.00	9.473	0.42	1.555	37.32	6.81	24.55 0.00	75.00% 100.00%	
Release Agent	7.50	1.0%		0.02	0.42	6.83E-04	0.02	2.99E-03	0.00E+00	100.00%	
Wetting Agent	8.00	22.0%		0.08	0.42	0.06	1.46	0.27	0.00E+00	100.00%	
				Total		3.11	74.69	13.63	63.90		
				VOC Control	0%						
				PM Control	85.0%						
				Potential Before Controls				13.63	63.9	0.00	
				Potential After Controls				13.63	9.58	0.00	

METHODOLOGY

Potential VOC Pounds per Hour = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Emission factor (lb/ton)*(1 ton/2000 lbs)

Potential VOC Pounds per Day = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day) * Emission factor(lb/ton)*(1 ton/2000 lbs)

Potential VOC Tons per Year = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs) * Emission factor(lb/ton)*(1 ton/2000lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)

Total = Sum of all worst case coatings and solvents used

Emission Factor (lbs VOC/ton) taken from "Unified Emission Factors for Open Molding of Composites", Composite Fabricators Association (CFA), April 1999

Transfer Efficiency is equal to 100%.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name: The New York Blower Company
Source Location: 171 Factory Street, La Porte, Indiana 46350
County: La Porte
SIC Code: 3564
Operation Permit No.: F 091-21675-00056
Permit Reviewer: Gail McGarrity

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from The New York Blower Company relating to the operation of a metal and fiberglass air moving equipment manufacturing source.

Source Definition

This metal and fiberglass air moving equipment manufacturing source consists of four (4) plants located on contiguous properties, having the same SIC codes, owned by one (1) company, and functioning as a single source. Therefore, they are considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Six (6) paint booths, identified as S1, S2, S3, S4, S7 and S8, constructed before 1980, equipped with air atomization spray guns and dry filters as overspray control, exhausting to stacks S1, S2, S3, S4, S7 and S8, respectively.
- (b) Two (2) paint booths, identified as S5 and S6, constructed before 1980, equipped with high volume, low pressure (HVLP) spray guns and dry filters as overspray control, exhausting to stacks S5 and S6, respectively.
- (c) One (1) paint booth, identified as S9, constructed after 1980, equipped with air atomization spray guns and dry filters as overspray control, exhausting to stack S9, respectively.
- (d) One (1) fiberglass spray booth, identified as S11, constructed before 1980, equipped with flow coaters and dry filters as overspray control, exhausting to stack S11.
- (e) One (1) fiberglass booth for hand cleaning molds with acetone, gel coat repair application using cup guns, and graphite application, identified as S12, constructed before 1980, equipped with dry filters as overspray control, exhausting to stack S12.
- (f) One shot blast unit, constructed in 2002, with a maximum nozzle pressure of 100 psi, inside nozzle diameter of 7/8 inch, capable of using a maximum of 3,360 pounds of abrasive per hour, controlled by a dust collector.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities/units at this source.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no new facilities proposed 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) Combustion related activities, including space heaters, process heaters heat treat furnaces, or boilers using natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

- (1) Plant 1 - Natural gas units

No. of Units	Emission Unit	Capacity (MMBtu per hour each)
3	Rapid Air Units	4.95
2	Reznor MUA	0.4
	Phosphate pressure wash	
2	units	0.32
6	Heaters	1.0
1	Heaters	0.104
1	Heaters	0.084
3	Heaters	0.06
3	Heaters	0.108
(2)	Plant 2 - Natural gas units	

No. of Units	Emission Unit	Capacity (MMBtu per hour each)
5	Heaters	0.084
1	Heater	0.28
2	Heaters	0.104
1	Heater	0.4
1	Heater	1.0
1	Air Makeup Unit	0.3465
1	Air Makeup Unit	0.2475
1	Air Makeup Unit	0.495
1	Air Makeup Unit	0.66
1	Air Makeup Unit	2.2
(3)	Plant 3 - Natural gas units	

No. of Units	Emission Unit	Capacity (MMBtu per hour each)
1	MUA Unit	5.4
1	MUA Unit	3.025
1	Phosphate Pressure	0.320

Wash Unit		
1	Heater	0.179
1	Heater	0.2
1	Heater	0.166
1	Heater	0.202
(4)	Plant 4 - Natural gas units	

No. of Units	Emission Unit	Capacity (MMBtu per hour each)
1	MUA Unit	5.5
1	MUA Unit	3.3
1	Wash Unit	2.0
1	Curing Oven	2.4
1	Drying Oven	2.4
1	Curing System	2.4
1	Wash Unit	0.32

(b) Welding units, capacity: 0.018 tons of electrode per hour.

(c) One (1) electrostatic closed loop powder spray booth, capacity: 15.3 pounds of powder coat per hour.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) FESOP 091-13638-00056, issued on May 29, 2001, and
- (b) SPR 091-16067-00056, issued on September 24, 2002.

All conditions from previous approvals were incorporated into this FESOP except the following:

- (a) FESOP 091-13638-00056, issued on May 29, 2001.

Conditions D.1.3 and D.2.2 Particulate Matter (PM) 326 IAC 6-3-2(c) The PM from the nine (9) paint booths and two (2) fiberglass booths shall not exceed the pounds per hour emission rate established as E in the following formula:

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

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

Reason not incorporated: On June 12, 2002, revisions to 326 IAC 326 IAC 6-3-2(c) (Process Operations) became effective. The rule citation particulate from surface coating is now 326 IAC 6-3-2(d) Particulate Emission Limitations, Work Practices and Control Technologies (Surface Coating). Conditions D.1.3 and D.2.2 have been removed from the permit and new conditions now D.1.3 and D.2.2 have been added to the permit that incorporates the 326 IAC 6-3 revisions that became effective on June 12, 2002. The surface coating emissions are controlled by work practice standards.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP 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 August 24, 2005. Additional information was received on November 20, 2006.

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

Emission Calculations

See pages 1 through 12 of Appendix A of this document for detailed emissions calculations.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	167.03
PM ₁₀	160.19
SO ₂	0.15
VOC	75.37

CO	21.0
NO _x	25.0
HAPs	Unrestricted Potential Emissions (tons/yr)
Xylene	37.38
Toluene	1.12E-03
Ethyl Benzene	5.11
Benzene	0.04
MIBK	9.78
Cobalt Compounds	2.04
Dibutyl Phthalate	4.80

Aliphatic Polyisocyanate	0.59
Styrene	13.4
Antimony Compounds	0.134
Nickel	0.0325
Dichlorobenzene	0.0003
Formaldehyde	0.0187
Hexane	0.45
Lead	0.000125
Cadmium	0.000275
Chromium	0.0324
Manganese	0.0161
TOTAL HAPS	73.83
Single HAP (xylene)	37.38

- (a) The uncontrolled emissions of PM₁₀ are greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source has opted to limit emissions of PM₁₀ below 100 tons per year to remain a FESOP source.
- (b) The uncontrolled emissions of any single HAP is equal to or greater than ten (10) tons per year and the uncontrolled emissions of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source has opted to limit emissions of single HAP to less than 10 tons per year and total HAPs to less than 25 tons per year to remain a FESOP source.

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. The source constructed new emission units, the source's potential to emit is based on the emission units included in this FESOP.

Process/emission unit	Potential To Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Paint Booths	6.44	6.44	-	60.4	-	-	<14
Fiberglass	9.58	9.58	-	13.63	-	-	<10
Powder Coating	0.67	0.67	-	-	-	-	0.134
Shot Blast	8.83	7.59	-	-	-	-	-
NG Combustion	0.48	1.90	0.15	1.37	21.00	25.00	0.47

Welding	0.224	0.224	-	-	-	-	0.08
Single HAP	-	-	-	-	-	-	<10
Total Emissions	26.22	26.40	0.15	75.37	21.00	25.00	<25

- (a) The potential to emit of each attainment regulated pollutants is less than 250 tons per year and it is not one of the 28 listed source categories. Therefore, it is not a major source for PSD purposes.
- (b) The potential to emit of each nonattainment criteria pollutant is less than 100 tons per year. Therefore, it is not a major source for Emission Offset.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in La Porte County.

Pollutant	Status
PM ₁₀	Attainment or Unclassifiable
PM _{2.5}	Attainment or Unclassifiable
SO ₂	Attainment or Unclassifiable
NO ₂	Attainment or Unclassifiable
8-hr Ozone	Marginal - Nonattainment
CO	Attainment or Unclassifiable
Lead	Attainment or Unclassifiable

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. La Porte County has been designated as marginal nonattainment for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) La Porte County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) La Porte County has been classified as unclassifiable or attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this permit for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) included in this permit for this source.
- (c) The insignificant phosphate washers do not use halogenated solvents. Therefore, the requirements of 40 CFR Part 63, Subpart T (Halogenated Solvent Cleaning Machine NESHAP) are not applicable.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in La Porte County and the potentials to emit PM₁₀, CO, SO₂, NO_x and VOC are less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM₁₀, shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New Source Toxics Control)

- (a) Since the paint and fiberglass booths at this source were constructed prior to July 27, 1997, the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, do not apply.
- (b) Since the shot blast unit is not a major source of HAPS the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, do not apply.

326 IAC 6-3-2(d) (Particulate Emissions Limitations, Work Practices and Control Technologies)

- (a) Particulate from the surface coating from the nine (9) paint booths and two (2) fiberglass booths shall be controlled by dry filters and the Permittee shall operate the control device

in accordance with manufacturer's specifications.

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

- ~~(a) Pursuant to 326 IAC 6-3-2(e)(3) (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the one (1) shot blast unit shall not exceed 5.8 pounds per hour at a process weight rate of 3,360 pounds per hour. The particulate emission limit shall be calculated using the following formula:~~

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

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

- (b) The PM emission PTE from the one (1) electrostatic closed loop powder spray booth is 0.153 pounds per hour. This is less than 0.551 pounds per hour; therefore, electrostatic closed loop powder spray booth is exempt from 326 IAC 6-3-2(e)(3) (Particulate Emission Limitations for Manufacturing Processes).

326 IAC 8-1-6 (New facilities; General reduction requirements)

- (a) The requirements of 326 IAC 8-1-6 are not applicable to the two (2) fiberglass booths because they were constructed prior to January 1, 1980.
- (b) The requirements of 326 IAC 8-1-6 are not applicable to the eight (8) paint booths, identified as S1 through S8, because they were constructed prior to 1980.
- (c) The one (1) paint booth, identified as S9, is subject to the requirements of 326 IAC 8-2-9. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

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

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the one (1) paint booth, identified as S9, constructed after 1980, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried and air dried coatings.

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 MSDSs submitted by the source and calculations made, the spray booth is in compliance with this requirement.

- (b) The eight (8) paint booths, identified as S1 through S8, are not subject to the requirements of 326 IAC 8-2-9 because they were constructed prior to 1980 in La Porte County.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The insignificant phosphate washers do not use organic solvents. Therefore, the requirements of 326 IAC 8-3 are not applicable.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source commenced operation after October 7, 1974, and prior to January 1, 1980 in La Porte County, but the potential to emit VOC is less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 8-6 do not apply.

Testing Requirements

The PM emissions from the shot blast unit is less than the allowable by a large margin. Therefore, testing from the shot blast unit is not 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 Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

Emission Units	Frequency	Monitoring
Nine (9) Paint Booths and two (2) fiberglass booths.	Daily	Inspections and manometer readings of dry filters.
Nine (9) Paint Booths and two (2) fiberglass booths.	When primary filter is changed	Secondary redundant filters
Paint Booth Stacks S1 through S9 and two (2) fiberglass booths.	Weekly	manometer reading during each primary filter change.
Paint Booth Stacks S1 through S9 and two (2) fiberglass booths.	At least once quarterly	Observations of the overspray from the stacks, while one or more booths are in operation.
		Observations of the overspray from the stacks, on rooftops and nearby ground each time a maintenance employee goes onto building rooftop, but no less than

Shot Blast Unit Stack
S13

Daily

once a quarter.
VE Notations and pressure drop of
dust collector.

Conclusion

The operation of this metal and fiberglass air moving equipment manufacturing source shall be subject to the conditions of the attached proposed FESOP No. F 091-21675-00056.

**Appendix A: Emissions Calculations
Emission Summary**

Company Name: New York Blower Company
Address City IN Zip: 171 Factory Street, La Porte, Indiana 46350
Permit Number: F091-21675-00056
Permit Reviwer: GMM

Uncontrolled Potential Emissions (tons/year)							
Emissions Generating Activity							
Pollutant	Paint	Fiberglass	Powder Coating	Shot Blast	NG	Welding	TOTAL
	Booths				Combustion		
PM	42.90	63.90	0.67	58.86	0.48	0.224	167.03
PM10	42.90	63.90	0.67	50.60	1.90	0.224	160.19
SO2					0.15		0.15
NOx					25.00		25.00
VOC	60.4	13.63			1.37		75.40
CO					21.00		21.00

Uncontrolled HAPS Emissions (tons/year)						
Pollutant	Paint Booths	Fiberglass	Powder Coating	NG Combustion	Welding	Total
Xylene	37.38					37.38
Toluene	2.74E-04			8.50E-04		1.12E-03
Ethyl Benzene	5.11					5.11
Benzene	0.04			5.25E-04		4.05E-02
MIBK	9.78					9.78
Cobalt Compounds	2.04					2.04
Dibutyl Phthalate	4.8					4.8
Aliphatic Polyisocynate	0.59					0.59
Styrene		13.4				13.4
Antimony Compounds			0.134			0.134
Nickel				5.25E-04	0.032	3.25E-02
Dichlorobenzene				3.00E-04		0.0003
Formaldehyde				1.87E-02		1.87E-02
Hexane				4.50E-01		0.45
Lead				1.25E-04		1.25E-04
Cadmium				2.75E-04		2.75E-04
Chromium				3.50E-04	0.032	3.24E-02
Manganese				9.50E-05	0.016	1.61E-02
Total						73.83

Total emissions based on rated capacity at 8,760 hours/year.

Worst Case HAPs (Sum of worst case HAPs of primers, urethane enamels, water reducible enamels, aerosol, enamels and solvent)

Controlled Potential Emissions (tons/year)							
Emissions Generating Activity							
Pollutant	Paint	Fiberglass	Powder Coating	Shot Blast	NG	Welding	TOTAL
	Booths				Combustion		
PM	6.44	9.58	0.67	8.83	0.48	0.224	26.22
PM10	6.44	9.58	0.67	7.59	1.90	0.224	26.40
SO2					0.15		0.15
NOx					25.00		25.00
VOC	60.4	13.63			1.37		75.40
CO					21.00		21.00

Controlled HAPs Emissions (tons/year)

Pollutant	Paint Booths	Fiberglass	Powder Coating	NG Combustion	Welding	Total Single HAP
Xylene	<10					<10
Toluene	2.74E-04			8.50E-04		1.12E-03
Ethyl Benzene	5.11					5.11
Benzene	0.04			5.25E-04		4.05E-02
MIBK	<10					<10
Cobalt Compounds	2.04					2.04
Dibutyl Phthalate	4.8					4.8
Aliphatic Polyisocyanate	0.59					0.59
Styrene		<10				<10
Antimony Compounds			0.134			0.134
Nickel				5.25E-04	0.032	3.25E-02
Dichlorobenzene				3.00E-04		0.0003
Formaldehyde				1.87E-02		1.87E-02
Hexane				4.50E-01		0.45
Lead				1.25E-04		1.25E-04
Cadmium				2.75E-04		2.75E-04
Chromium				3.50E-04	0.032	3.24E-02
Manganese				9.50E-05	0.016	1.61E-02
Limited Totals	<14	<10	0.134	0.47	0.08	
Total Combination of HAPs <25						

Total emissions based on rated capacity at 8,760 hours/year.

Worst Case HAPs (Sum of worst case HAPs of primers, urethane enamels, water reducible enamels, aerosol, enamels and solvent)

**Appendix A: Emissions Calculations
VOC and Particulate
From Paint Booth Operations**

Company Name: The New York Blower Company
Address City IN Zip: 171 Factory Street, La Porte, Indiana 46350
FESOP: F 091-21675-00056
Reviewer: GMM

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	PM/PM10 Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Carrier Gray 98-5300	8.70	66.60%	56.3%	10.3%	58.6%	30.60%	0.35000	5.781	2.16	0.90	1.81	43.51	7.94	12.88	2.93	50%
nyb Green Enamel 98A5251	9.54	61.32%	46.9%	14.4%	51.6%	27.81%	0.35000	5.781	2.84	1.38	2.78	66.80	12.19	16.35	4.95	50%
Safety Orange Enamel 98-5290	8.84	65.66%	50.0%	15.7%	53.4%	27.56%	0.35000	5.781	2.97	1.38	2.80	67.22	12.27	13.45	5.02	50%
Safety Yellow Enamel 98-5291	9.11	68.78%	56.4%	12.4%	61.0%	22.61%	0.35000	5.781	2.89	1.13	2.28	54.77	10.00	12.60	4.99	50%
Hi Heat Gray Enamel 98-5253	9.60	59.80%	48.3%	11.5%	62.6%	29.31%	0.35000	5.781	2.95	1.10	3.72	53.61	9.78	17.10	3.77	50%
Hi Heat Green Enamel 98A5253	9.30	62.35%	50.9%	11.5%	64.8%	29.35%	0.35000	5.781	3.02	1.06	2.15	51.71	9.44	15.52	3.63	50%
Gray Primer 98B5257	11.66	26.10%	0.0%	26.1%	0.0%	51.80%	0.35000	5.781	3.04	3.04	6.16	147.78	26.97	38.18	5.88	50%
Heresite 504 -Brown 98A5269	8.49	29.60%	0.0%	29.6%	0.0%	62.30%	0.35000	5.781	2.51	2.51	5.08	122.03	22.27	26.48	4.03	50%
Blue Urethane Enamel (9501) 98-5282	10.71	30.20%	0.0%	30.2%	0.0%	51.46%	0.35000	5.781	3.23	3.23	6.54	157.06	28.66	33.13	6.29	50%
White Urethane Enamel 98-5285	10.68	30.20%	0.0%	30.2%	0.0%	51.70%	0.35000	5.781	3.23	3.23	6.53	156.62	28.58	33.03	6.24	50%
Gray Primer 98B5332	10.09	43.70%	12.0%	31.7%	18.8%	37.00%	0.35000	5.781	3.94	3.20	6.47	155.32	28.35	25.17	8.64	50%
White Epoxy 98A5286	13.07	15.80%	0.0%	15.8%	0.0%	70.28%	0.35000	5.781	2.07	2.07	4.18	100.28	18.30	48.76	2.94	50%
Urethane Cure Agent 98-5288	9.50	0.70%	0.0%	0.7%	0.0%	99.20%	0.35000	5.781	0.07	0.07	0.13	3.23	0.59	41.80	0.07	50%
Gray Enamel CES 98-5532	9.61	52.70%	22.0%	30.7%	0.0%	38.40%	0.35000	5.781	2.95	2.95	5.97	143.27	26.15	20.14	7.68	50%
Fed Gray Epoxy 98A5312	13.05	26.50%	0.0%	26.5%	0.0%	70.08%	0.35000	5.781	3.46	3.46	7.00	167.93	30.65	42.50	4.93	50%
Shale Gray Urethane 98A5318	10.71	30.20%	0.0%	30.2%	0.0%	51.70%	0.35000	5.781	3.23	3.23	6.65	15.71	2.87	3.31	6.26	50%
Triotech Curing Agent	8.14	57.29%	0.0%	57.3%	0.0%	36.65%	0.35000	5.781	4.66	4.66	9.44	226.46	41.33	15.41	12.72	50%
Speedy Enamel Blue 98A5331	8.51	44.60%	10.0%	34.6%	14.0%	45.00%	0.35000	5.781	3.42	2.94	5.96	142.98	26.09	20.89	6.54	50%
Sulzer Metco Gray 98A5330	8.00	51.00%	18.6%	32.4%	28.2%	36.00%	0.35000	5.781	3.61	2.59	5.24	125.87	22.97	17.37	7.20	50%
Activator Semi-Gloss	8.43	60.18%	0.0%	60.2%	0.0%	28.77%	0.35000	5.781	5.07	5.07	10.26	246.36	44.96	14.87	17.63	50%
nyb Green (aerosol) 98-5267	6.44	80.87%	12.8%	68.1%	0.0%	10.97%	0.00010	5.781	4.38	4.38	0.00	0.06	0.01	0.00	39.97	50%
Gloss Activator	7.44	79.65%	0.0%	79.7%	0.0%	18.74%	0.35000	5.781	5.93	5.93	11.99	287.77	52.52	6.71	31.62	50%
Polane Gray Primer 98-5600	11.30	31.85%	20.35%	11.5%	38.3%	40.00%	0.35000	5.781	2.23	1.25	2.53	60.70	11.08	34.12	3.25	50%
Farr Blue 98-5608	8.63	45.50%	29.7%	15.8%	50.8%	31.00%	0.35000	5.781	2.77	1.36	2.76	66.21	12.08	20.84	4.40	50%
Farr Green 98-5607	8.73	45.50%	31.6%	13.9%	56.1%	28.00%	0.35000	5.781	2.76	1.21	2.46	58.93	10.75	21.08	4.33	50%
Polane Ameron Gray 98-5601	10.53	33.00%	24.0%	9.0%	41.1%	41.00%	0.35000	5.781	1.61	0.95	1.92	46.02	8.40	31.26	2.31	50%
Polane White Enamel 98-5601	10.53	33.00%	24.0%	9.0%	48.0%	41.00%	0.35000	5.781	1.82	0.95	1.92	46.02	8.40	31.26	2.31	50%
Jet Black Epoxy 98A5301	11.86	18.60%	0.0%	18.6%	0.0%	68.27%	0.35000	5.781	2.21	2.21	4.46	107.12	19.55	42.78	3.23	50%
Beige Epoxy 98A5302	10.86	20.90%	0.0%	20.90%	0.0%	67.30%	0.35000	5.781	2.27	2.27	4.59	110.22	20.12	38.06	3.37	50%
Tan Epoxy MHA0031	10.85	20.95%	0.0%	21.0%	0.0%	67.30%	0.35000	5.781	2.27	2.27	4.60	110.38	20.14	38.01	3.38	50%
OSHA Blue Epoxy MHA0036	11.86	18.60%	0.0%	18.6%	0.0%	68.27%	0.35000	5.781	2.21	2.21	4.46	107.12	19.55	42.78	3.23	50%
Black W/R Enamel 98-5540	9.10	36.25%	0.0%	36.3%	0.0%	40.00%	0.35000	5.781	3.30	3.30	6.67	160.19	29.23	25.71	8.25	50%
Epoxy Converter 98B532	11.70	17.20%	0.0%	17.2%	0.0%	71.97%	0.35000	5.781	2.01	2.01	4.07	97.72	17.83	42.93	2.80	50%
Heresite Solvent 98-5270	6.24	100.00%	0.0%	100.0%	0.0%	0.00%	0.00010	5.781	6.24	6.24	0.00	0.09	0.02	0.00	n/a	50%
Epoxy Thinner 98-5266	7.13	100.00%	0.0%	100.0%	0.0%	0.00%	0.03900	5.781	7.13	7.13	1.61	38.58	7.04	0.00	n/a	50%
Butyl cellosolve MF-0190	7.51	100.00%	0.0%	100.0%	0.0%	0.00%	0.00440	5.781	7.51	7.51	0.19	4.58	0.84	0.00	n/a	50%

Potential Emissions	Add worst case coating to all solvents	PM /PM10	Control Efficiency	85.00%	Uncontrolled	Controlled
Only nyb green, Carrier Gray and Hi-Heat Gray are used on the booth S9.					13.8	331.0
					60.4	42.9
						6.440

METHODOLOGY

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

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: New York Blower Company
Address City IN Zip: 171 Factory Street, La Porte, Indiana 46350
Permit Number: F091-21675-00056
Permit Reviewer: GMM

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % xylene	Weight % Toluene	Weight % Ethyl Benzene	Weight % Benzene	Weight % Methyl Isobutyl Ketone	Weight % Cobalt Compounds	Weight % Dibutyl Phthalate	Weight % Aliphatic Polyisocyanate	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Benzene Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Cobalt Compound Emissions (ton/yr)	Dibutyl Phthalate Emissions (ton/yr)	Aliphatic Polyisocyanate Emissions (ton/yr)
Primers																			
Polane Gray Primer 98-5600	11.30	0.35	5.781							2.00%		0.00	0.00	0.00	0.00	0.00	0.00	2.00	0.00
Prereduced Gray Primer 98A5332	10.09	0.35	5.781	14.00%		2.00%						12.52	0.00	1.79	0.00	0.00	0.00	0.00	0.00
Gray Primer 98B5257	11.66	0.35	5.781	1.00%		0.10%	0.01%					1.03	0.00	0.10	0.01	0.00	0.00	0.00	0.00
Epoxy Coatings																			
Federal Gary Epoxy 98A5312	10.40	0.35	5.781	0.10%		0.10%		1.00%				0.09	0.00	0.09	0.00	0.92	0.00	0.00	0.00
Blue Epoxy MHA0036	11.86	0.35	5.781	0.10%		0.10%		1.00%				0.11	0.00	0.11	0.00	1.05	0.00	0.00	0.00
White Epoxy 98A5286	11.06	0.35	5.781	0.10%		0.10%		1.00%				0.10	0.00	0.10	0.00	0.98	0.00	0.00	0.00
Jet Black Epoxy 98A5301	11.86	0.35	5.781	0.10%		0.10%		5.00%				0.11	0.00	0.11	0.00	5.26	0.00	0.00	0.00
Beige Epoxy 98A5302	10.85	0.35	5.781	1.00%		0.10%		5.00%				0.96	0.00	0.10	0.00	4.81	0.00	0.00	0.00
Tan Epoxy MHA0031	10.85	0.35	5.781	1.00%		0.10%		5.00%				0.96	0.00	0.10	0.00	4.81	0.00	0.00	0.00
Epoxy Converter 98B5302	11.70	0.35	5.781	1.00%		0.10%						1.04	0.00	0.10	0.00	0.00	0.00	0.00	0.00
Urethane Enamel																			
White Urethane Enamel 98-5285	10.68	0.35	5.781	10.00%		1.00%	0.01%					9.46	0.00	0.95	0.01	0.00	0.00	0.00	0.00
Shale Gray Urethane 98A5318	10.71	0.35	5.781	5.00%		1.00%	0.01%					4.75	0.00	0.95	0.01	0.00	0.00	0.00	0.00
Urethane Blue Enamel 98-5282	10.71	0.35	5.781	10.00%		1.00%	0.01%					9.49	0.00	0.95	0.01	0.00	0.00	0.00	0.00
Water Reducible Enamel																			
W/R Green A/D Enamel 98A5251	9.54	0.35	5.781						0.60%			0.00	0.00	0.00	0.00	0.00	0.00	0.51	0.00
Polane W/R White Enamel 98-5601	10.53	0.35	5.781							3.00%		0.00	0.00	0.00	0.00	0.00	0.00	2.80	0.00
Aerosol																			
NYB Green (aerosol) 98-5267	6.44	0.0001	5.781	10.00%	1.68%	2.29%						1.63E-03	2.74E-04	0.00	0.00	0.00	0.00	0.00	0.00
Enamel																			
Speedry Enamel Blue 98A5331	8.51	0.35	5.781	19.00%		3.00%		6.00%				14.33	0.00	2.26	0.00	4.53	0.00	0.00	0.00
Sulzer Metro Gray 98A5330	8.00	0.35	5.781	17.00%		1.00%		1.00%				12.05	0.00	0.71	0.00	0.71	1.53	0.00	0.00
Enamel KEM Aqua, Farr Blue 98-56	8.63	0.35	5.781						2.00%			0.00	0.00	0.00	0.00	0.00	0.15	0.00	0.00
Farr Green Enamel 98-5607	8.73	0.35	5.781						0.20%			0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Solvent																			
Urethane Cure Agent 98-5288	9.49	0.35	5.781								0.70%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.59

Worst Case HAPs (Sum of worst case HAPs of primers, urethane enamels, water reducible enamels, aerosol, enamels and solvent)

37.38 2.74E-04 5.11 0.04 9.78 2.04 4.80 0.59

METHODOLOGY

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

**Appendix A: Emissions Calculations
VOC and Particulate
Reinforced Plastics and Composites**

Company Name: The New York Blower Company
Address City IN Zip: 171 Factory Street, La Porte, Indiana 46350
FESOP: F 091-21675-00056
Reviewer: GMM

Material (Application Method)	Density (lb/gal)	Weight % Monomer VOC	CFA Unified Emission Factor (lbs/ton)	Gallons per unit	Units per hour	Pounds VOC per hour	Pounds VOC per day	VOC tons/year	PM /PM10 tons/year	Transfer Efficiency
Resin Layup - Hetron R (Flow Coat)										
Styrene	10.45	28.0%	59.92	11.37	0.42	1.50	35.88	6.55	39.34	75.00%
Resin Layup - Derakane R (Flow Coat)										
Styrene	9.09	38.0%	86.00	9.473	0.42	1.555	37.32	6.81	24.55	75.00%
Release Agent	7.50	1.0%		0.02	0.42	6.83E-04	0.02	2.99E-03	0.00E+00	100.00%
Wetting Agent	8.00	22.0%		0.08	0.42	0.06	1.46	0.27	0.00E+00	100.00%
				Total		3.11	74.69	13.63	63.90	
				VOC Control	0%					
				PM Control	85.0%					
				Potential Before Controls				13.63	63.9	
				Potential After Controls				13.63	9.58	

METHODOLOGY

Potential VOC Pounds per Hour = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Emission factor (lb/ton)*(1 ton/2000 lbs)

Potential VOC Pounds per Day = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (24 hrs / 1 day) * Emission factor(lb/ton)*(1 ton/2000 lbs)

Potential VOC Tons per Year = Density (lb/gal)* Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs) * Emission factor(lb/ton)*(1 ton/2000lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hr/yr) * (1 ton / 2000 lbs)

Total = Sum of all worst case coatings and solvents used

Emission Factor (lbs VOC/ton) taken from "Unified Emission Factors for Open Molding of Composites", Composite Fabricators Association (CFA), April 1999

**Appendix A: Emission Calculations
HAP Emissions
Reinforced Plastics and Composites**

Company Name: New York Blower Company
Address City IN Zip: 171 Factory Street, La Porte, Indiana 46350
Permit Number: F091-21675-00056
Permit Reviewer: GMM

Material (Application Method)	Density (lb/gal)	Weight % Monomer	CFA Unified Emission Factor (lbs/ton)	Gallons per unit	Units per hour	Pounds Resin per hour	Tons Resin per year	Styrene tons/year
Resin Layup - Hetrion R (Flow Coat)								
Styrene	10.45	28.0%	59.92	11.37	0.42	49.90	218.57	6.55
Resin Layup - Derakane R (Flow Coat)								
Styrene	9.09	38.0%	86.00	9.473	0.42	36.17	158.41	6.81
				Total		86.07	376.98	13.36

METHODOLOGY

Pounds of Resin per Hour = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr)

Tons of Resin per Year = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs)

Tons of Styrene per Year = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * (8760 hr/yr) * (1 ton / 2000 lbs) * Emission factor (lb/ton) * (1 ton / 2000 lbs)

Emission Factor (lbs styrene / ton) taken from "Unified Emission Factors for Open Molding of Composites", Composite Fabricators Association (CFA), April 1999

**Appendix A: Emissions Calculations
 Natural Gas Unit Capacity Total
 MM BTU/HR <100
 Insignificant Units**

Company Name: The New York Blower Company
Address City IN Zip: 171 Factory Street, La Porte, Indiana 46350
Permit ID: F091-21675-00056
Reviewer: GMM

Plant 1		Total	Plant 2		Total
No. of Units	MMBtu/Hr.	MMBtu/Hr.	No. of Units	MMBtu/Hr.	MMBtu/Hr.
3	4.950	14.850	5	0.084	0.420
2	0.400	0.800	1	0.280	0.280
2	0.320	0.640	2	0.104	0.208
6	1.000	6.000	1	0.400	0.400
1	0.104	0.104	1	1.000	1.000
1	0.084	0.084	1	0.3465	0.347
3	0.060	0.180	1	0.2475	0.248
3	0.108	0.324	1	0.495	0.495
21		22.982	1	0.660	0.660
			1	2.200	2.200
			15		6.257

Plant 3		Total	Plant 4		Total
No. of Units	MMBtu/Hr.	MMBtu/Hr.	No. of Units	MMBtu/Hr.	MMBtu/Hr.
1	5.400	5.400	1	5.500	5.500
1	3.025	3.025	1	3.300	3.300
1	0.320	0.320	1	2.000	2.000
1	0.179	0.179	3	2.400	7.200
1	0.200	0.200	1	0.320	0.320
1	0.166	0.166	7		18.320
1	0.202	0.202			
7		9.492			

SourceTotal MMBtu/hr. **57.051**

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler**

Company Name: The New York Blower Company
Address City IN Zip: 171 Factory Street, La Porte, Indiana 46350
FESOP: F 091-21675-00056
Reviewer: GMM

All Insignificant Combustion

Heat Input Capacity	Potential Throughput
MMBtu/hr	MMCF/yr
57.051	499.77

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.475	1.90	0.150	25.0	1.37	21.0

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

**Appendix A: Emissions Calculations
 Natural Gas Combustion Only
 MM BTU/HR <100
 Small Industrial Boiler
 HAPs Emissions**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.25E-04	3.00E-04	1.87E-02	4.50E-01	8.50E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPs
	Potential Emission in tons/yr	1.25E-04	2.75E-04	3.50E-04	9.50E-05	5.25E-04

Methodology is the same as page 4.

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

**Appendix A: PM and HAP emissions
Insignificant Powder Coating**

Company Name: The New York Blower Company
Address City IN Zip: 171 Factory Street, La Porte, Indiana 46350
FESOP: F 091-21675-00056
Reviewer: GMM

Powder Coating

Material	Maximum Input (lbs/hr)	Percent Recovered (%)	Maximum Usage (lbs/hr)	PTE PM/PM10 (lbs/hr)	PTE PM/PM10 (tons/yr)	Weight % HAP (%)	PTE HAP (tons/yr)
Powder (no VOC)	15.3	99.0%	0.153	0.153	0.670	20.0%	0.134

HAPs are contained in Yellow Coating used at this source. potentially emitted.

The weight % HAPs represents the total weight % of Nickel Antimony Titanium Yellow Rutile, which contains Antimony and Nickel.

Methodology

Maximum Usage (lbs/hr) = Maximum input (lbs/hr) - (Maximum input (lbs/hr) * (1-percent recovered))

PTE PM/PM10 (lbs/hr) = Maximum Usage (lbs/hr)

PTE PM/PM10 (tons/yr) = PTE PM/PM10 (lbs/hr) * 8760 hrs/yr / 2000 lbs/ton

PTE HAP (tons/yr) = PTE PM/PM10 (tons/yr) * Weight % HAP

Appendix A: Welding and Thermal Cutting

Company Name: The New York Blower Company
Address City IN Zip: 171 Factory Street, La Porte, Indiana 46350
FESOP: F 091-21675-00056
Reviewer: GMM

PROCESS	Max. electrode consumption (lbs/hr)	EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
		PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING										
Submerged Arc	0	0.036				0.000	0	0.000	0	0.000
Metal Inert Gas (MIG)(Haynes 25)	36.5	0.0014	0.0001	0.0002	0.0002	0.051	0.004	0.007	0.007	0.018
Stick (E7018 electrode)	0	0.0211				0.000	0	0.000	0	0.000
Tungsten Inert Gas (TIG)(carbon steel)	0	0.0055				0.000	0	0.000	0	0.000
Oxyacetylene(carbon steel)	0	0.0055				0.000	0	0.000	0	0.000
EMISSION TOTALS						PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr						0.051	0.004	0.007	0.007	0.018
Potential Emissions lbs/day						1.226	0.088	0.175	0.175	0.438
Potential Emissions tons/year						0.224	0.016	0.032	0.032	0.080

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Emission factors for Haynes 25 provided by applicant.

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

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

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

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.

