



TO: Interested Parties / Applicant

RE: Geiger & Peters, Inc./ FESOP 1st Significant Permit Revision No.: F097-21739-00135

FROM: Felicia A. Robinson
Administrator

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 fifteen (15) calendar days of the receipt of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (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 Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



Air Quality Hotline: 317-327-4AIR | knozone.com

Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw

Certified Mail #: 7007 0220 0002 7444 3972

June 5, 2007

Mr. Perry Williams
Maintenance Supervisor
Geiger and Peters, Inc.
761 South Sherman Drive
Indianapolis, IN 46203



Re: 1st Significant Permit Revision, F097-21739-00135,
to FESOP F097-17400-00135

Dear Mr. Williams:

Geiger and Peters, Inc., herein after referred to as "source", was issued a Federally Enforceable State Operating Permit (FESOP) on May 17, 2004, for the site located at 761 South Sherman Drive, Indianapolis, Indiana 46203, in regards to conducting an operation for structural fabrication of iron, steel and other metal products, for bridges and buildings. An application for the purposes of this review and a notification of change for replacement of the Horizontal Roller Blast Machine baghouse, was received on May 9, 2005, by the Indianapolis Office of Environmental Services (OES) and Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). An additional application for a new emission unit (3rd spray painting gun) was received by the offices mentioned above, on October 16, 2006. Both applications were combined into this significant permit revision.

Pursuant to the provisions of 326 IAC 2-8-11.1(f)(1)(G) and 326 IAC 2-8-11.1(g), this FESOP is hereby modified through a significant permit revision. The changes are as shown in the attached Technical Support Document (TSD). Any other conditions of the permit not addressed in the TSD, shall remain unchanged and in effect. Please find attached a copy of the revised permit.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the IDEM, OAQ and OES.
2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. **Effective Date of the Permit**
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9, the IDEM Commissioner and OES Administrator may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.



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Department of Public Works Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

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indygov.org/dpw

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

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

Sincerely,

Original Signed by Felicia A. Robinson

Felicia A. Robinson
Administrator

Enclosures: Revised FESOP Permit
Technical Support Document (TSD) &
Appendix A (calculations)
TSD addendum

FAR/cmb

cc: Mindy Hahn, IDEM, OAQ (electronic file)
Marion County Health Department
Matt Mosier, OES, Air Compliance
OES files (3)



New Source Review Federally Enforceable State Operating Permit (FESOP) Renewal

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY and INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

**Geiger & Peters, Inc.
761 South Sherman Drive
Indianapolis, Indiana 46203**

(herein known as the Permittee) is hereby authorized to construct and 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.

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.: F097-17400-00135	
Original signed by: John B. Chavez, Administrator Indianapolis Office of Environmental Services	Issuance Date: May 17, 2004 Expiration Date: May 17, 2009
First Significant Permit Revision No.: F097-21739-00135	Sections modified: Section A, Section B, Section C, Sections D.1, D.2, and D.3.
Issued by: Original Signed by Felicia A. Robinson Felicia A. Robinson Administrator Office of Environmental Service	Issuance Date: June 5, 2007 Expiration Date: May 17, 2009



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**Department of Public Works
Office of Environmental Services**

2700 Belmont Avenue
Indianapolis, IN 46221

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES). 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 structural metal fabrication.

Source Address:	761 South Sherman Drive, Indianapolis, Indiana 46203
Mailing Address:	761 South Sherman Drive, Indianapolis, Indiana 46203
General Source Phone Number:	(317) 358-9521
SIC Code:	3441
County Location:	Marion
Source Location Status:	Nonattainment for 8-hour ozone standard Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD, Emission Offset Rules and Nonattainment New Source Review Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) Irvin Industries Horizontal Roller Blast machine identified as Emission Unit ID Horizontal Roller Blast Machine. Model number 100-1m-10. Maximum unit capacity of 3,900 pounds of steel shot/grit cycled per hour. Equipped with one (1) reverse flow baghouse for particulate matter control identified as Control Equipment ID CE #1 and exhausting to Stack/Vent ID CE #1. Installation date of 1982, modified last in 2006.
- (b) One (1) Graco Spray Painting Operation utilizing three (3) airless spray painting guns identified as Emission Unit ID Spray Painting. Fabricated steel beams and other miscellaneous metal parts are spray painted inside the manufacturing building and are not directly exhausted to any control equipment or Stack/Vent ID. Maximum rated capacity to apply coatings is 1.0 gallon of coating per unit and 3.23 units per hour. Installation date of 1905, modified last in 2007.

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

(c) This stationary source also includes the following insignificant activities:

- (1) Natural gas-fired combustion sources with heat input equal or less than ten (10) million Btu per hour.
- (2) Machining where an aqueous cutting coolant continuously floods the machining surface.
- (3) The following equipment related to manufacturing activities resulting in negligible emissions of HAPs: flame cutting torches and welding equipment.

- (4) Any of the following structural steel and bridge fabrication activities: Cutting 200,000 linear feet or less of one (1) inch plate or equivalent and/or using eighty (80) tons or less of welding consumables.
- (5) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (6) Paved and unpaved roads and parking lots with public access.
- (7) Other activities not previously identified (by category) with emissions equal to or less than Insignificant Activity thresholds: drilling holes, saw cutting, grinding, and punching metal beams and plates.

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

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

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, F097-17400-00135, 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 and OES, 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]

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

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 and OES, within a reasonable time, any information that IDEM, OAQ and OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and OES copies of records required to be kept by this permit.

- (b) For information furnished by the Permittee to IDEM, OAQ and OES, 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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 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

and

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

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

- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ and OES 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 and OES may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.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 prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

and

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

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

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and OES. IDEM, OAQ and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The 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 OES within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM, OAQ, telephone number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or 317-233-0178 (ask for Compliance Section),
Facsimile number: 317-233-6865;
Indianapolis Office of Environmental Services phone: (317) 327-2234 (ask for OES Air Compliance Section),
Facsimile number: (317) 327-2274.

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

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

and

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

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F097-21739-00135 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

and

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

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 and OES determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ and OES to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ and OES at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ and OES 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 OES and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by 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

and

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

- (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 and OES 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 and OES takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and OES any additional information identified as 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

and

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

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

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

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 and OES in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade 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 and 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, and OES 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

and

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

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 and OES 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 and OES 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 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.25 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 Overall Source Limit [326 IAC 2-8] [326 IAC 2-2] [326 IAC 2-3]

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset) not applicable.
- (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 and 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.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

C.6 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 IDEM 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

and

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

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).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

C.7 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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 and OES.

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

and

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

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 and OES 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 and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and OES if the Permittee submits to IDEM, OAQ and OES a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 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

and

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

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.10 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.11 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 pressure gauge or other 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.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

and

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

within 180 days from the date on which this source commences operation.

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

- (c) If the ERP is disapproved by IDEM, OAQ and OES, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

- (f) Upon direct notification by IDEM, OAQ and OES that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.13 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.14 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; and/or
 - (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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

The response action documents submitted pursuant to this condition do require the certification by 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.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the IDEM Commissioner or OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the IDEM Commissioner or OES Administrator 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.17 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

and

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. 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 and OES. The general public may request this information from the IDEM, OAQ and OES under 326 IAC 17.1.

Stratospheric Ozone Protection

C.18 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 [326 IAC 2-8-4(10)]:

- (a) One (1) Irvin Industries Horizontal Roller Blast Machine identified as Emission Unit ID Horizontal Roller Blast Machine. Model number 100-1m-10. Maximum unit capacity of 3,900 pounds of steel shot/grit cycled per hour. Equipped with one (1) reverse flow baghouse for particulate matter control identified as Control Equipment ID CE #1 and exhausting to Stack/Vent ID CE #1. Installation date of 1982, modified last in 2006.

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

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

D.1.1 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations except Lake County), PM emissions from Emission Unit ID Horizontal Roller Blast Machine shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

D.1.2 Particulate Matter Ten (10) Microns or Less (PM10) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 Federally Enforceable Permit Program, PM-10 emissions from the Emission Unit ID Horizontal Roller Blast Machine, shall not exceed 2.25 pounds per hour (lb/hr) and thus be limited to less than 40 tons per year (tpy).

This limit, combined with Emission Unit ID Spray Painting PM-10 potential emissions (PTE) of 42.67 tpy and Insignificant Activities PM-10 PTE of 10.8 tpy, enforceably limits source-wide PM-10 emissions to less than the major source threshold of one hundred (100) tpy.

Compliance with this FESOP limit renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

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

A Preventive Maintenance Plan, in accordance with Section B.11 - Preventive Maintenance Plan, of this permit, is required for the Emission Unit ID Horizontal Roller Blast Machine and its emission control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of FESOP, F097-17400-00135, in order to demonstrate compliance with Condition D.1.1 and Condition D.1.2, the Permittee shall perform PM and PM-10 testing for Emission Unit ID Horizontal Roller Blast Machine utilizing methods as approved by the IDEM Commissioner and OES Administrator. PM-10 includes filterable and condensable particulate matter. Testing shall be conducted in accordance with Condition C.7 - Performance Testing.

D.1.5 Particulate Matter

- (a) In order to comply with Condition D.1.1 and Condition D.1.2, the control equipment for PM for Emission Unit ID Horizontal Roller Blast Machine, identified as CE #1, shall be in operation at all times when Emission Unit Horizontal Roller Blast Machine is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, 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 and OES

of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.1.6 Visible Emissions Notations

- (a) Once per day visible emission notations of the CE #1 stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions 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 the section mentioned above, shall be considered a deviation from this permit.

D.1.7 Baghouse Parametric Monitoring - Pressure Readings

- (a) The Permittee shall record the pressure drop across the baghouse controlling the blasting machine, identified as Control Equipment ID CE #1, at least once per day when the blasting machine is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 to 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable 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.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications of this permit, shall be subject to approval by IDEM, OAQ and OES, and shall be calibrated at least once every six (6) months.

D.1.8 Broken or Failed Bag Detection

- (a) For a single compartment baghouse, controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down no later than the completion of the processing of the material in the line. 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).

Bag failure can be indicated by a significant drop in the baghouse's 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 triboflows.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain daily records of visible emission notations of the Emission Unit ID Horizontal Roller Blast Machine stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain daily records of pressure drop readings of the Control Equipment ID CE #1. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of notation (e.g., the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

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

- (b) One (1) Graco Spray Painting Operation utilizing three (3) airless spray painting guns identified as Emission Unit ID Spray Painting. Fabricated steel beams and other miscellaneous metal parts are spray painted inside the manufacturing building and are not directly exhausted to any control equipment or Stack/Vent ID. Maximum rated capacity to apply coatings is 1.0 gallon of coating per unit and 3.23 units per hour. Emission Unit ID Spray Painting includes the use of Hydro-Zinc, Theme-Zinc, and F.C. Typoxy coatings, used unthinned, i.e. no thinners or solvents are used in the coating. Installation date of 1905, modified last in 2007.

(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 Volatile Organic Compounds (VOCs) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings as applied to miscellaneous metal parts, including maintenance spray painting of production equipment, shall be limited to 3.5 pounds of VOCs per gallon of coating less water for air dried or forced warm air dried coatings.

D.2.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8] [326 IAC 2-4.1] [40 CFR 63]

Pursuant to FESOP 097-17400-00135 and 326 IAC 2-8, the hazardous air pollutant (HAP) emissions shall be limited as follows:

Usage of any single HAP shall be limited to less than nine and eight-tenths (9.8) tons per twelve (12) consecutive month period with compliance determined at the end of each month for the Spray Painting operation, such that emissions of any single HAP from the entire source shall be below ten (10) tons per year and any combination of HAPs shall be below twenty-five (25) tons per year, with compliance determined at the end of each month. Therefore, PTE is enforceably restricted to less than the major source threshold. Compliance with this FESOP limit renders the requirements of 326 IAC 2-7, 326 IAC 2-4.1 and 40 CFR 63, not applicable.

D.2.3 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations except Lake County), PM emissions from the Emission Unit ID Spray Painting shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.11 - Preventive Maintenance Plan, of this permit, is required for this facility and its emission control devices.

Compliance Determination Requirements

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

Compliance with the VOC content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, and OES reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.6 Hazardous Air Pollutants (HAP) [326 IAC 8-1-2][326 IAC 8-1-4]

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

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

D.2.7 Monitoring

Should overspray emissions from Emission Unit ID Spray Painting be directed to the outside air:

- (a) Weekly observations shall be made of the overspray originating from the surface coating area while one or more of the paint guns are in operation. If a condition exists which would 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 Condition C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the surface coating area and the presence of overspray on the nearby ground outside of this designated surface coating area. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is 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 Condition 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.2.8 Volatile Organic Compound (VOC) Content and Usage

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.2.1.
 - (1) The type, amount, and VOC content of each coating material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use;
 - (3) The VOC content of the coatings used, as applied, for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain a log of weekly overspray observations and monthly inspections.

D.2.9 Hazardous Air Pollutants (HAP)

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limit(s) established in Condition D.2.2.
- (1) The amount and HAP content of each coating material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use;
 - (3) Any single HAP usage for each month;
 - (4) The weight of any single HAP emitted for each calendar month, considering capture and control efficiency, if applicable;
 - (5) Identification of the facility or facilities associated with the usage of each HAP.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.10 Record Keeping and Reporting Requirements

- (a) To document compliance with Condition D.2.7 and Condition D.2.8, the Permittee shall maintain records of weekly and monthly observations of the overspray from surface coating area while one or more of the paint guns are in operation.
- (b) A quarterly summary to document compliance with operation Condition D.2.2 - Hazardous Air Pollutants, shall be submitted to the address(es) listed in Condition C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3

EMISSION UNIT OPERATION CONDITIONS

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

- (c) This stationary source also includes the following insignificant activities:
- (1) Natural gas-fired combustion sources with heat input equal or less than ten (10) million Btu per hour.
 - (2) Machining where an aqueous cutting coolant continuously floods the machining surface.
 - (3) The following equipment related to manufacturing activities resulting in negligible emissions of HAPs: flame cutting torches and welding equipment.
 - (4) Any of the following structural steel and bridge fabrication activities: Cutting 200,000 linear feet or less of one (1) inch plate or equivalent and/or using eighty (80) tons or less of welding consumables.
 - (5) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
 - (6) Paved and unpaved roads and parking lots with public access.
 - (7) Other activities not previously identified (by category) with emissions equal to or less than Insignificant Activity thresholds: drilling holes, saw cutting, grinding, and punching metal beams and plates.

(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 Matter (PM) [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations except Lake County), PM emissions from insignificant activities shall not exceed 0.03 per dry standard cubic foot of exhaust air.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OES**

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

Source Name: Geiger & Peters, Inc.
Source Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
Mailing Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
FESOP Permit No.: F097-17400-00135

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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE
2700 S. Belmont Avenue
Indianapolis, Indiana 46221
Phone: 317-327-2234
Facsimile Number: 317-327-2274**

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

Source Name: Geiger & Peters, Inc.
Source Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
Mailing Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
FESOP Permit No.: F097-17400-00135

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, 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
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE**

FESOP Quarterly Report

Source Name: Geiger & Peters, Inc.
Source Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
Mailing Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
FESOP Permit No.: F097-17400-00135
Facility: **Emission Unit ID Spray Painting**
Parameter: Monthly Single HAP Limitation
Limit: **Less than 9.8 tons per year for single HAP per 12 consecutive month period, with compliance determined monthly.**

YEAR: _____

Highest Single HAP Emissions in tons per 12 Consecutive Month Period

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter. Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Geiger & Peters, Inc.
 Source Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
 Mailing Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
 FESOP Permit No.: F097-17400-00135

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

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. 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 ΔNo deviations occurred this reporting period@.</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Mail to: City of Indianapolis, Air Permits
2700 S. Belmont Avenue
Indianapolis, IN 46221

Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204

Geiger & Peters, Inc.
761 South Sherman Drive
Indianapolis, Indiana 46203

Affidavit of Construction

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal knowledge of the
(Company Name)
representations contained in this affidavit and am authorized to make these representations on behalf of

(Company Name)
4. I hereby certify that Geiger & Peters, Inc., located at 761 South Sherman Drive, Indianapolis, Indiana, 46203, has constructed the 3rd spray painting gun for the Emission Unit ID Spray Painting, in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on October 16, 2006, and as permitted pursuant to Construction and Operation Permit No.: F 097-21739-00135, issued on _____.
5. Additional _____ were constructed/substituted as described in the attachment of
(operations/facilities)
this document and were not made in accordance with the construction permit.

Further Affiant said not.
I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS
COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on
this _____ day of _____, 20 _____.
My Commission expires: _____.

Signature

Name (typed or printed)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**Addendum to the
Technical Support Document (TSD) for a New Source Review (NSR) and Federally
Enforceable State Operating Permit (FESOP) Significant Permit Revision**

Source Name:	Geiger & Peters, Inc.
Source Location:	761 South Sherman Drive, Indianapolis, Indiana 46203
County:	Marion
SIC Code:	3441
Operation Permit No.:	F097-17400-00135
1st Sig. Permit Revision No.:	F097-21739-00135
Permit Reviewer:	Carmen Bugay

On April 12, 2007, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services (OES), had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Geiger & Peters, Inc., hereby referred to as "source", located at 761 South Sherman Drive, Indianapolis, Indiana 46203, applied for a significant permit revision to their Federally Enforceable State Operating Permit (FESOP) issued on May 17, 2004. The notice also stated that IDEM, OAQ and OES proposed to issue a permit for this construction and operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On April 23, 2007, the source submitted comments on the draft FESOP significant permit revision. Upon further review, the OAQ and OES have decided to make the following revisions to the draft documents. The TSD will remain as it originally appeared when published. Changes to the permit or technical support material that occur after the permit has published for public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. The Table of Contents has been modified to reflect these changes.

The comments from the source and responses from IDEM, OAQ and Indianapolis OES, including changes to the permit are addressed below. **Bolded** language has been added and the language with ~~strikeout~~ has been deleted as follows:

Comment #1:

The source maintains that in condition D.1.7, the pressure drop range across the Horizontal Roller Blast Machine's baghouse (CE #1) should be in the range of 1 to 6 inches of water, instead of 1 to 3 inches of water, based on the first stack test of April 10, 2007. Additional operational and manufacturer's documentations were provided by the source to support the range of 1 to 6 inches of water.

Response #1:

The source has provided manufacturer documentation supporting the pressure drop across the control equipment (CE #1) to be in the range of 1 to 6 inches of water. Therefore, this change is reflected in condition D.1.7 of the permit as follows:

D.1.7 Baghouse Parametric Monitoring - Pressure Readings

-
- (a) The Permittee shall record the pressure drop across the baghouse controlling the blasting machine, identified as Control Equipment ID CE #1, at least once per day when the blasting machine is in operation. When for any one reading, the pressure drop

across the baghouse is outside the normal range of 1.0 to ~~3.0~~ **6.0** inches of water or a range established during the latest stack test, the Permittee shall take reasonable 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.

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

Comment #2:

The source maintains that the PMP should not include the operating equipment (emission unit); the PMP should only include coverage of the control device.

Response to Comment# 2:

OES and IDEM maintain that the PMP requirements must be included in every applicable permit, pursuant to the PMP requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. 326 IAC 1-6-3(b) provides that "...as deemed necessary by the Commissioner, any person operating a facility shall comply with the requirements of subsection (a) of this section."

Many types of facilities require maintenance in order to prevent excess emissions. If the Horizontal Roller Blast Machine is not maintained, the result will be an increase in air emissions. Therefore, OES and IDEM have not made any changes as a result of this comment.

Comment #3:

The source disagrees with the need to calibrate the monitoring instrument every six months as required in condition D.1.7 (Baghouse Parametric Monitoring - Pressure Readings). It is the intention of the Preventive Maintenance Plan (PMP) to ensure that the monitoring instrument functions properly through a system check. Therefore the source asked that the language in D.1.7(b) be changed to reflect calibration of the monitoring instrument per the manufacturer's specification.

Response to Comment #3:

In order for the Permittee and the OES/IDEM inspector to determine that the pressure drop across the Horizontal Roller Blast Machine baghouse (CE#1) is in the appropriate range, the instrument (Magnahelic) must be of the appropriate scale, in working condition, and readable. The calibration requirement ensures that both the Permittee and the inspector are able to obtain the appropriate information from the instrument. Pressure drop is an indicator of a variety of conditions within the baghouse. Any deviations from the normal operational range of the unit, whether gradual or sudden, should alert the operator that the unit needs maintenance. The accurate and consistent operation of the device used to measure the pressure drop must be assured or the respective monitoring data would be invalid.

The source indicates that the manufacturer recommends recalibration after the pressure gauge deviates more than 20% from range (1.6 inches of water on a 0 to 8 inch range), but no additional information to substantiate how (and how often) Geiger & Peters will respond to readings out of the 20% range, is provided.

Therefore, regular calibration of the device used to measure the pressure drop is necessary, and OES and IDEM believe that this calibration needs to be performed at least once every six months. A system check as per a PMP, is not sufficient to ensure that the instrument is calibrated as specified above. Consequently, the Permittee has not submitted sufficient evidence to justify a less frequent calibration period, and thus Condition D.1.7(b) has not been changed.

Comment #4:

In regards to condition D.2.10, Geiger & Peters states that it does not operate a paint booth, and that the paint operations are in an open area which are not directly exhausted to any control equipment or Stack/Vent ID (as stated in the facility description in Condition D.2). The source contends that the reference to "booth stacks" should be replaced with "area"; and that "booths" should be replaced with "paint guns".

Geiger and Peters also maintains that it is unclear what the purpose is between having both a weekly inspection and a monthly inspection for these specific painting operations, since there is no stack to observe because the painting occurs in a general building area. In addition, there will be no reason to go up on the roof to inspect for overspray once per month; paint will not migrate up on the roof. It is unclear where the boundary is between when to make a weekly observation of overspray versus when to make a monthly observation of overspray. Perhaps the intention of the two parts is to track the origin and follow the overspray in Condition D.2.7(a), while Condition D.2.7(b) is reserved for after-the-fact overspray deposit discovery.

Response #4:

OES and IDEM have revised Condition D.2.10(a) to reflect the source's comments. In addition, OES and IDEM have added that the Permittee shall maintain records of monthly observations, to be consistent with the monitoring Condition D.2.7.

D.2.10 Record Keeping and Reporting Requirements

- (a) To document compliance with Condition D.2.7 and Condition D.2.8, the Permittee shall maintain records of weekly **and monthly** observations of the overspray from the surface coating ~~booth stack area~~ while one or more of the ~~booths~~ **paint guns** are in operation.

In order to clarify the condition in regards to the weekly observations being performed while the unit is in operation, OES and IDEM have revised Conditions D.2.7(a) and (b) as specified below:

D.2.7 Monitoring

Should overspray emissions from Emission Unit ID Spray Painting be directed to the outside air:

- (a) Weekly observations shall be made of the overspray **originating** from **the** surface coating ~~booth stack area~~ while one or more of the ~~booths~~ **paint guns** are in operation. If a condition exists which would 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 Condition C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from **the surface coating stacks area** and the presence of overspray on ~~the rooftops and/or~~ the nearby ground **outside of this designated surface coating area**. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is 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 Condition C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Additional Changes: IDEM and OES have decided to make the following changes.

IDEM and OES Change #1:

The following condition has been corrected as follows:

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ and OES that retesting in ~~one hundred and~~ **one hundred** twenty (120) days is not practicable, IDEM, OAQ and OES may extend the retesting deadline.

IDEM and OES Change #2:

IDEM and OES intend for records related to visible emission notations and pressure drop to be taken each day. In order to clarify this, the following revisions have been made to the conditions specified below:

D.1.6 Visible Emissions Notations

- (a) Once per day visible emission notations of the CE #1 stack exhaust shall be performed during normal daylight operations ~~when exhausting to the atmosphere~~. A trained employee shall record whether emissions are normal or abnormal.

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain **daily** records of ~~once per day~~ visible emission notations of **the** Emission Unit ID Horizontal Roller Blast Machine stack exhaust, ~~when the blasting machine is in operation~~. **The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).**
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain **daily** records of ~~once per day~~ pressure **drop** readings of **the** Control Equipment ID CE #1, ~~when the blasting machine is in operation~~. **The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of notation (e.g., the process did not operate that day).**

IDEM and OES Change #3:

IDEM has decided to include Mail Codes in their mailing addresses. The following changes have been made throughout the permit:

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

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

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

IDEM and OES Change #4:

Condition B.13 is the same as Condition A.5. Thus Condition A.5 is being deleted, and correspondingly, this condition was removed from the Table of Contents.

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

~~(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either:~~

~~(1) incorporated as originally stated,~~

~~(2) revised, or~~

~~(3) deleted~~

~~by this permit.~~

~~(b) All previous registrations and permits are superseded by this permit.~~

IDEM and OES Change #5:

IDEM and OES have decided that Condition C.1 needs to reference 326 IAC 2-2 and 2-3, based on the county's current status. Consequently, the Table of Contents was modified to reflect this revision. Therefore, this condition has been changed as follows:

C.1 Overall Source Limit [326 IAC 2-8] **[326 IAC 2-2] [326 IAC 2-3]**

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. **This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset) not applicable.**

IDEM and OES Change #6:

IDEM and OES have decided that paragraph (a) from Condition D.1.8, be moved to Condition D.1.5.

D.1.5 Particulate Matter

(a) **In order to comply with Condition D.1.1 and Condition D.1.2, the control equipment for PM for Emission Unit ID Horizontal Roller Blast Machine, identified as CE #1, shall be in operation at all times when Emission Unit Horizontal Roller Blast Machine is in operation.**

- (b) In the event that bag failure is observed in a multi-compartment baghouse, 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 and OES of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

D.1.8 Broken or Failed Bag Detection

~~In the event that bag failure has been observed:~~

- ~~(a) In the event that bag failure is observed in a multi-compartment baghouse, 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 and OES of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~
- (b a) For a single compartment baghouse, controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (e b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down no later than the completion of the processing of the material in the line. 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).

IDEM and OES Change #7:

IDEM and OES have clarified Condition D.2.2 as stated below:

D.2.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8] [326 IAC 2-4.1] [40 CFR 63]

Pursuant to FESOP 097-17400-00135 and 326 IAC 2-8, the hazardous air pollutant (HAP) emissions shall be limited as follows:

- ~~(a)~~ Usage of any single HAP shall be limited to less than nine and eight-tenths (9.8) tons per twelve (12) consecutive months **period with compliance determined at the end of each month** for the Spray Painting operation, such that **emissions of** any single HAP ~~emission~~ from the entire source shall be below ten (10) tons per year (tpy) and any combination of HAPs shall be below twenty-five (25) tons per year, with compliance determined at the end of each month. Therefore, PTE is enforceably restricted to less than the major source threshold. Compliance with this FESOP limit renders the requirements of 326 IAC 2-7, 326 IAC 2-4.1 and 40 CFR 63, not applicable.

IDEM and OES Change #8:

IDEM and OES have made changes to the following Forms as appropriate. (Continued on the next page.)

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

FESOP Quarterly Report

Source Name: Geiger & Peters, Inc.
Source Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
Mailing Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
FESOP Permit No.: F097-17400-00135
Facility: **Emission Unit ID Spray Painting**
Parameter: Monthly Single HAP Limitation
Limit: Less than 9.8 tpy tons per year for single HAP per 12 consecutive month period, ~~with (assures compliance with less than 25 tpy for combination HAPs per 12 consecutive month period.)~~ Compliance determined monthly.

YEAR: _____

Highest Single HAP Emissions in tons per 12 Consecutive Month Period

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.

Mail to: City of Indianapolis, Air Permits
2700 S. Belmont Avenue
Indianapolis, IN 46221

Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204

Geiger & Peters, Inc.
761 South Sherman Drive
Indianapolis, Indiana 46203

Affidavit of Construction

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____, I have personal knowledge of the
(Company Name)

representations contained in this affidavit and am authorized to make these representations on behalf of

(Company Name)

4. I hereby certify that Geiger & Peters, Inc., located at 761 South Sherman Drive, Indianapolis, Indiana, 46203, has constructed the 3rd spray painting gun for the Emission Unit ID Spray Painting, in conformity with the requirements and intent of the construction permit application received by the Office of Air-Management-Quality on October 16, 2006, and as permitted pursuant to Construction and Operation Permit No.: F 097-21739-00135, issued on _____.

~~5. I hereby certify that Geiger & Peters, Inc. is now subject to the FESOP requirements and limitations stated in the F097-21739-00135, and will submit a FESOP operating permit application within twelve (12) months from the postmarked submission date of this Affidavit of Construction.~~

5. **Additional _____ were constructed/substituted as described in the attachment of (operations/facilities)**

this document and were not made in accordance with the construction permit.

Further Affiant said not.

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

Signature

Date

STATE OF INDIANA)
)SS
COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on
this _____ day of _____, 20 _____.

My Commission expires: _____.

Signature

Name (typed or printed)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**Technical Support Document (TSD) for a New Source Review (NSR) and Federally
Enforceable State Operating Permit (FESOP) Significant Permit Revision**

Source Background and Description

Source Name:	Geiger & Peters, Inc.
Source Location:	761 South Sherman Drive, Indianapolis, Indiana 46203
County:	Marion
SIC Code:	3441
Operation Permit No.:	F097-17400-00135
1st Significant Revision No.:	F097-21739-00135
Permit Reviewer:	Carmen Bugay

The Office of Environmental Services (OES) has reviewed applications from Geiger & Peters, Inc. relating to a structural metal fabrication operation. For specific revisions, please refer to the *History and Proposed Changes to Emission Units and Control Devices* section of this TSD.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) Irvin Industries Horizontal Roller Blast machine identified as Emission Unit ID Horizontal Roller Blast Machine. Model number 100-1m-10. Maximum unit capacity of 3900 pounds of steel shot/grit cycled per hour. Equipped with one (1) reverse flow baghouse for particulate matter control identified as Control Equipment ID CE #1 and exhausting to Stack/Vent ID CE #1. Installation date of 1982.
- (b) One (1) Graco Spray Painting Operation utilizing two (2) airless spray painting guns identified as Emission Unit ID Spray Painting. Fabricated steel beams and other miscellaneous metal parts are spray painted inside the manufacturing building and are not directly exhausted to any control equipment or Stack/Vent. Maximum rated capacity to apply coatings is 1.0 gallon of coating per unit and 1.5 units per hour. Installation date of 1905.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (a) Natural gas-fired combustion sources with heat input equal or less than ten (10) million Btu per hour;
- (b) Machining where an aqueous cutting coolant continuously floods the machining surface;
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (d) Any of the following structural steel and bridge fabrication activities: Cutting 200,000 linear feet or less of one (1) inch plate or equivalent and/or using eighty (80) tons or less of

- welding consumables;
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
 - (f) Paved and unpaved roads and parking lots with public access;
 - (g) Other activities not previously identified (by category) with emissions equal to or less than Insignificant Activity thresholds: drilling holes, saw cutting, shearing, flame cutting and/or punching steel beams and plates.

History and Proposed Changes to Emission Units and Control Devices

- (a) **PM-10 Emission Limitation change:**
A notification of change to replace the baghouse for the horizontal roller blast machine was received on May 9, 2005. The Condition D.1.2, Particulate Matter Ten (10) microns or less, included a limit based on the variable air flow rate through the horizontal roller blast machine's baghouse. This limit is being modified to contain an enforceable FESOP limit. Of note, this limit is no longer written based on the 0.03 grains/dcfm, but was recalculated to limit source-wide PM-10 emissions to less than the major source threshold of 100 tons per year.
- (b) **Single HAP Emission Limitation change:**
In addition, the single Hazardous Air Pollutants (HAP) single limitation for the Spray Painting operation has been changed to reflect any single HAP < 10 tpy threshold limit. This single HAP limitation assures that the combined HAP PTE will stay below the 25 tpy major threshold limit.
- (c) **Insignificant Activities:**
These activities and associated calculations have been revised to show additional contributing emissions.
- (d) **Change/Replacement of Control Device:**
The source is replacing a control equipment (CE#1), baghouse, to the Horizontal Roller Blast Machine (emission unit). This replacement will not result in any increased emissions after control, and will comply with the same applicable requirements, permit terms, and conditions.
- (e) **Addition of spray painting gun to Emission Unit ID Spray Painting:**
On October 16, 2006, an application was received for the addition of a 3rd airless spray painting gun to the Emission Unit ID Spray Painting. This request is being incorporated into this significant permit modification.
- (f) **Other Specific IDEM and OES changes to permit:**
Refer to the *Proposed Changes to the FESOP* section of this TSD.

Existing Approvals

This source has been operating under the following approvals:

- (a) F097-17400-00135, FESOP renewal, issued on May 17, 2004;

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the OES Administrator that this significant permit revision be approved. This recommendation is based on the following facts and conditions:

An application (097-21739-00135) for the purposes of this review for replacement of the Horizontal Roller Blast Machine baghouse, was received on May 9, 2005. An additional application (097-23768-00135) for a new emission unit (3rd spray painting gun) was received on October 16, 2006. Both applications were combined into this significant permit revision. Additional information was received on November 22 and December 13, 2005; August 2, 18, September 11, 20, 26, 28, 29, October 2, 11, 12, 16, 2006; and January 5, 22, February 2, 21, March 9, 13, 2007.

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

Emissions Calculations

See Appendix A of this TSD, pages 1-10 for more detailed calculations.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM2.5	non-attainment
PM10	attainment
SO ₂	maintenance attainment
NO ₂	attainment
8-hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM-10 emissions as surrogate for PM2.5 emissions, pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.
- (b) Marion County has been classified as attainment or unclassifiable in Indiana for PM10, SO₂, NO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

- (e) **Fugitive Emissions**
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions - Source-wide

These tables reflect the unrestricted potential emissions (PTE) source-wide before this revision, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Potential Emissions (tons/year)
PM	230.2
PM-10	177.3
SO ₂	0.020
VOC	42.91
CO	2.866
NO _x	3.412

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

HAPs*	Potential Emissions (tons/year)
Xylene (single)	32.9
Ethyl Benzene	7.50
Combined HAPs	37.7

*Note: Single HAP and Combined HAPs are worst case operating scenario.

- (a) The unrestricted potential emissions of particulate matter less than ten (10) microns (PM-10) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

Unrestricted Potential Emissions for New Emission Unit

These tables reflect the unrestricted potential emissions (PTE) for the new emission unit (3rd spray painting gun).

New Emission Unit (3rd spray painting gun) (tons/year)	
Pollutant	PTE
PM	22.857
PM-10	22.857
SO ₂	0
VOC	22.88
CO	0
NO _x	0

Note: For the purpose of determining Title V applicability for particulates,

PM-10, not PM, is the regulated pollutant in consideration.

New Emission Unit (3rd spray painting gun)/ (tons/year)	
HAPs*	PTE
Xylene (single)	17.62
Ethyl Benzene	4.02
Combined HAPs	20.1

*Note: Single HAP and Combined HAPs are worst case operating scenarios.

- (a) Pursuant to 326 IAC 2-8-11.1(f)(1)(G), any modification with a potential to emit (PTE) greater than or equal to ten (10) tons per year (tpy) of a single hazardous air pollutant (HAP) as defined under Section 112(b) of the CAA, is subject to a significant permit revision procedures. The source's new emission unit PTE is at 17.62 tpy (see above table.). Therefore, the source is subject to a significant permit revision.
- (b) Pursuant to 326 IAC 2-8-11.1(g), this permit revision require adjustments to the emission cap limitations such as the single HAP limitation and PM-10 limitation. These revisions change existing requirements for the units or processes under the cap. Therefore, the source is subject to a significant permit revision.

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.

Limited Potential to Emit (tons/year)									
Process / facility	PM	PM-10 ¹	SO ₂	VOC	CO	NO _x	HAP Single ²		HAP Comb.
Emission Unit ID Horizontal Roller Blast Machine	176.95	40.0	0	0	0	0	0		0
Emission Unit ID Spray Painting	42.67	42.67	0	42.73	0	0	<9.8	Xylene	<17.3
Insignificant Activities (Natural Gas Combustion)	0.058	0.233	0.018	0.168	2.572	3.062	0.0551	Hex	0.00016
(Kerosene Combustion)	0.007	0.027	0.002	0.019	0.294	0.35	0.0063	Hex	0.01209
(Others)	10.54	10.54	0.0	0.0	0.0	0.0	0.0423	Mn	0.0669
Total Emissions	<250	<100	<250	<100.0	<100	<100	<10.0	Xylene	< 25

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) This existing source is not a major stationary source because no nonattainment pollutant is emitted at a rate of 100 tons per year or greater.

Note¹: PM-10 emissions from the Horizontal Roller Blast Machine are limited to 2.25 pounds per hour (lb/hr) and less than 40 tons per year (tpy) per 12 month consecutive month period. This limit is structured such that source-wide PM-10

emissions are limited to less than the major source threshold of 100 tons per year (tpy) , when the Spray Painting significant emissions of 42.67 tpy plus the total insignificant activities of 10.8 tpy, are included in the calculations [(40.0 + 42.67 + 0.233 + 0.027 + 10.54 = 93.47 tpy < 100 tpy)]. Compliance with this FESOP limitation will be determined at the end of each month.

Note²: Single HAP emissions from the Spray Painting operations be limited to below 10 tpy, such that the source-wide single HAP emissions will be less than 10 tpy per 12 month consecutive month period, with compliance determined at the end of each month. Compliance with this FESOP limitation will be determined at the end of each month. In addition by limiting the single HAP emissions, combined HAPs potential to emit (PTE) levels will stay below the major source-wide threshold of 25 tpy.

Compliance with these FESOP limitations renders the requirements of 326 IAC 2-7 and 40 CFR Part 63 (Part 70 Permit Program) not applicable.

Federal Rule Applicability

Federal Rule applicability for the entire source has not changed from the renewal FESOP, F097-17400-00135. For purposes of comparison with the next sections, this section is listed below as follows:

- (a) This structural metal fabrication operation does not fall under any of categories under 40 CFR 60, Subparts EE (Surface Coating of Metal Furniture), MM (Automobile and Light Duty Truck Surface Coating Operations), SS (Industrial Surface Coating: Large Appliances), or TT (Metal Coil Surface Coating). There are no other New Source Performance Standards (NSPS, 326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) This source falls under a category regulated by the MACT standard 40 CFR 63, Subpart Mmmm as a source of miscellaneous metal parts and products surface coating operations. Subpart Mmmm was promulgated (signed by the EPA Acting Administrator) in August, 2003. The final compliance date for existing sources is three (3) years from the final rule publication date in the Federal Register. This existing source is limited to HAP emissions less ten (10) tons per year of a single HAP and twenty-five (25) tons per year of a combination of HAPs. Therefore, the source is not a major HAP source and is not subject to the requirements of 40 CFR 63, Subpart Mmmm (National Emission Standards for Miscellaneous Metal Parts and Products Surface Coating Operations), is not affected by Clean Air Act Section 112j, and is not required to submit a Part I MACT Application.

State Rule Applicability - Entire Source

State Rule applicability for the entire source has not changed from F097-17400-00135 with the exception of the following:

326 IAC 1-7 Stack Height Provisions

All sources having exhaust gas stacks through which a potential of twenty-five (25) tons per year or more of particulate matter (PM) are emitted and for which construction commenced after June 19, 1979, shall be constructed using good engineering practice (GEP) stack height. Emission Unit ID Horizontal Roller Blast Machine has uncontrolled potential emissions of PM in excess of 25.0 tons per year (see Appendix A). With the use of a baghouse at an estimated 98% PM control efficiency, actual emissions at maximum capacity and 8,760 hours of operation are less than 25.0 tons per year. 326 IAC 1-7-5 specifically exempts sources from the GEP stack height requirement if actual emissions (after controls) are less than 25 tons per year. Therefore, requirements of 326 IAC 1-7 shall not apply.

326 IAC 2-1.1-5 (Non-attainment New Source Review)

This source is not major under nonattainment NSR because it has chosen to limit their PM-10 emissions to less than 100 tons of PM-10 (as surrogate for PM2.5). Therefore, the Non-attainment New Source Review requirements are not applicable, and are not included in this permit.

326 IAC 2-2 (Prevention of Significant Deterioration)

The requirements of 326 IAC 2-2 do not apply to this source because the potential to emit before controls of criteria pollutants are less than the threshold levels for applicability of the rule (i.e. 250 tons per year), the source was built in 1905, and is not one of 28 listed source categories under 326 IAC 2-2.

326 IAC 2-3 (Emission Offset)

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

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

The Spray Painting operation utilizing three (3) airless spray painting guns, identified as EU ID Spray Painting, is not a major source of HAP; therefore, rule 326 IAC 2-4.1-1 does not apply.

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

Pursuant to 326 IAC 2-8 and F097-17400-00135 issued on May 17, 2004, the following PM-10 and single HAP limitations apply:

- (a) Source wide PM-10 emissions shall be limited to less than 100 tons per year. PM-10 emissions shall be limited to 2.25 pounds per hour (lb/hr) and less than 40 tons per year (tpy) for the Horizontal Roller Blast Machine. This limit, combined with Spray Painting Operation PM-10 potential emissions of 42.67 tpy and all the Insignificant Activities PM-10 potential emissions of 10.8 tpy (see Emissions Calculations Appendix A of this TSD), enforceably limits source wide PM-10 emissions to less than the major source threshold of 100 tons per year.
- (b) Potential to Emit (PTE) of any single HAP exceeds the major source threshold of ten (10) tons per year (tpy). Therefore, input of any single HAP to the Spray Painting operation is limited to 9.8 tpy, such that the source-wide single HAP emissions are less than ten (10) tons per twelve (12) consecutive month period and a combination of HAPs are less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, PTE of any single HAP and combined HAPs are enforceably restricted to less than the major source threshold, and the requirements of 326 IAC 2-7 and 40 CFR 63 (Part 70 Permit Program) are not applicable.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6.5-1-1 (Particulate Matter Limitations Except Lake County)

This source is not specifically listed in sections 6.5-1-6 (Marion County), but has the potential to emit one hundred (100) tons or more of particulate matter per year, and is located in Marion County; therefore, this source is subject to 326 IAC 6.5-1-2, which states that particulate matter emissions shall not exceed 0.03 grains per dry standard cubic foot (dscf).

326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes)

326 IAC 6-3-1(c) states that it does not apply if nonattainment area particulate emissions are more stringent than 326 IAC 6.5-1. Therefore, this regulation is not included in this permit.

State Rule Applicability - Individual Facilities

State Rule Applicability for individual units has changed as follows:

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

The new 3rd spray painting gun incorporated into Emission Unit ID Spray Painting, is not a major source of HAP, since the source is limiting their single HAP to below 10 tpy, the major limitation threshold. This single HAP limitation assures compliance with the combined HAP 25 tpy major limitation threshold. Therefore, 326 IAC 2-4.1-1 does not apply, and is not included into this permit revision.

326 IAC 6.5-1-2 (Particulate Matter Limitations except Lake County)

Pursuant to 326 IAC 6.5-1-2, each Emission Unit listed as ID Horizontal Roller Blast Machine and ID Spray Painting particulate matter emissions, are limited to 0.03 gr/dscf. Of note, the FESOP limitation is no longer written based on the 0.03 grains/dcfm, but was recalculated to limit source-wide PM-10 emissions to less than the major source threshold of 100 tons per year. Therefore, since this regulation applies, each emission unit is not subject to 326 IAC 6-3-1(c), and this regulation will not be included in this permit revision.

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

This source has an SIC of 3441 and surface coats miscellaneous metal parts in Marion County. The 326 IAC 8-2-9 is an applicable requirement because actual VOC emissions exceed fifteen (15) pounds per day. Pursuant to 326 IAC 8-2-9, the volatile organic compound (VOC) content of coating(s) applied in Emission Unit ID Spray Painting shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried or forced warm air dried coatings up to 194 degrees Fahrenheit. The facility is not presently equipped with a drying oven or drying equipment and all coatings are air dried.

Based on the permit applications, VOC content in the coatings applied in Emission Unit ID Spray Painting, is no greater than 3.02 lbs/gal (see Appendix A, page 5 of 10). Therefore, the emission unit will be able to be in compliance with this requirement.

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.

Compliance Determination Requirements

326 IAC 2-8-5(1) (Testing Requirements)

Testing for the Emission Unit ID Horizontal Roller Blast Machine under the FESOP 097-17400-00135, will remain unchanged, and will be conducted in accordance with Condition C.8 - Performance Testing.

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.

Any changes to the compliance determination or monitoring requirements are as described at the end of this TSD.

Conclusion

The operation of this structural metal fabrication operation shall be subject to the conditions of the attached proposed 1st Significant Permit Revision No.: F097-21739-00135.

Proposed Changes to the FESOP:

Pursuant to the provisions of 326 IAC 2-8-10(14), this FESOP is hereby modified through a significant permit revision to reflect the changes below. Revisions are being made to the Section A, Section B, Section C, Section D, Table of Contents (TOC), address notifications, and forms as appropriate. More specific comments have been included above each section or condition. The **bold language is new** language that has been added, and the ~~language with a line through~~ it has been taken out.

SECTION A SOURCE SUMMARY

Proposed Change# 1:

Marion County has been classified by U.S. EPA in 70 FR 943 dated January 5, 2005, as nonattainment for the 8-hour ozone standard, thus NOx and VOC were reviewed based on the Emission Offset Rules (mentioned below). Until U.S. EPA adopts specific New Source Review (NSR) rules for PM2.5 emissions, it has directed states to regulate PM-10 emissions as surrogate for PM2.5 emissions, pursuant to the non-attainment NSR requirements. Thus the Source Status line of Condition A.1 General Information, is being updated to include this status. Furthermore, IDEM and OES have determined that is it not necessary to identify the Authorized Individual in the permit. This information is being removed from the Condition A.1.

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

The Permittee owns and operates a structural metal fabrication operation under a Standard Industrial Classification Code (SIC) of 3441 (establishments primarily engaged in fabricating iron and steel or other metals for structural purposes, such as bridges, buildings, etc.).

~~Authorized Individual: Plant Manager~~
Source Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
Mailing Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
General Source Phone: (317) 358-9521
SIC Code: 3441
Source Location Status: Marion County
Nonattainment for 8-hour ozone standard
Nonattainment for PM-2.5
Attainment for all **other** criteria pollutants.
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, Section 112 of the Clean Air Act
Minor Source, under PSD, **Emission Offset Rules, and**
Nonattainment New Source Review.

Proposed Change# 2:

Emission units and control equipment descriptions have been modified to take out reference to baghouse CE#1, exhausting air flow rate of 8,700. In this permit revision, the existing baghouse has been removed and replaced with a baghouse with an exhausting air flow rate of 8,780. Therefore, this part of the description has been removed. Furthermore, the Permittee has submitted information indicating that some insignificant activities were changed or removed, while others such as brazing and soldering operations are trivial activities, pursuant to 326 IAC 2-7-1(40)(E)(iii). Therefore, these activities were removed from the A.3 condition of the permit.

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

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

- (a) One (1) Irvin Industries Horizontal Roller Blast machine identified as Emission Unit ID Horizontal Roller Blast Machine. Model number 100-1m-10. Maximum unit capacity of 3,900 pounds of steel shot/grit cycled per hour. Equipped with one (1) reverse flow baghouse for particulate matter control identified as Control Equipment ID CE #1 and exhausting at ~~8,700 acfm~~ at to Stack/Vent ID CE #1. Installation date of 1982, modified last in 2006.
- (b) One (1) Graco Spray Painting Operation utilizing ~~two (2)~~ **three (3)** airless spray painting guns identified as Emission Unit ID Spray Painting. Fabricated steel beams and other miscellaneous metal parts are spray painted inside the manufacturing building and are not directly exhausted to any control equipment or Stack/Vent ID. Maximum rated capacity to apply coatings is 1.0 gallon of coating per unit and ~~4.5~~ **3.23** units per hour. Installation date of 1905, modified last in 2007.

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

(c) This stationary source also includes the following insignificant activities:

- (3) The following equipment related to manufacturing activities ~~not resulting in negligible the emissions of HAPs: brazing equipment, flame cutting torches, soldering equipment, and welding equipment.~~ **not resulting in negligible the emissions of HAPs: flame cutting torches, and welding equipment.**

- (7) Other activities not previously identified (by category) with emissions equal to or less than Insignificant Activity thresholds: drilling holes, saw cutting, ~~shearing, grinding, flame cutting and/or~~ punching metal ~~steel~~ beams and plates.

Proposed Change# 3:

IDEM and OES have decided to include the following updates to Sections B and C to further address and clarify the permit terms and the terms of the conditions.

Unless specifically addressed in a D condition related to a control device requiring a Preventive Maintenance Plan (PMP), IDEM and OES have determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM and OES have deleted paragraph (b) of Condition B.11 – Preventive Maintenance and has amended Condition B.12 – Emergency Provisions.

Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, a condition (B.25 - Credible Evidence) reflecting this rule has been added.

In order to avoid duplication of requirements which may be included in D sections, Condition C.6 – Operation of Equipment has been removed from the permit.

IDEM and OES have reconsidered the requirement to develop and follow a Compliance Response Plan (Condition C.15). The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. Therefore, the condition for “Compliance Response Plan” has been replaced by the condition for “Response to Excursions or Exceedances”.

Section B and C have been updated as follows:

SECTION B — GENERAL CONDITIONS

B.1 — ~~Permit No Defence [IC 13]~~

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

B.2 — ~~Definitions [326 IAC 2-8-1]~~

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

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

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

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

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

~~(b) — Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.~~

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

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

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

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

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

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

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

~~(a) — The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, and OES copies of records required to be kept by this permit.~~

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

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

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

~~contain a schedule for expeditious compliance with the applicable requirement.~~

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

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

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

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

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251~~

~~and~~

~~Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221~~

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

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

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

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

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

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

~~Telephone No.: 1-800-451-6027 (ask for IDEM, OAQ, Compliance Section) or;
Telephone No.: 317-233-0178 (ask for IDEM, OAQ, Compliance Section)
Facsimile No.: 317-233-6865~~

~~and~~

~~Telephone No.: 317-327-2234 (ask for OES Air Compliance Section)~~

~~Facsimile No.: 317-327-2274~~

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

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251~~

~~and~~

~~Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46224~~

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

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

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

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

- ~~(6) The Permittee immediately took all reasonable steps to correct the emergency.~~
- ~~(e) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.~~
- ~~(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.~~
- ~~(e) IDEM, OAQ, and OES, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(e)(6) be revised in response to an emergency.~~
- ~~(f) Failure to notify IDEM, OAQ, and OES, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.~~
- ~~(g) Operations may continue during an emergency only if the following conditions are met:~~
- ~~(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~
- ~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.~~

~~Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

~~(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.~~

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

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

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
400 North Senate Avenue
Indianapolis, Indiana 46204-2254~~

~~and~~

~~Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46224~~

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

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

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

~~B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination~~

~~[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]~~

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

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

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

~~Request for renewal shall be submitted to:~~

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204-2251~~

~~and~~

~~Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221~~

- ~~(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]~~

~~(1) A timely renewal application is one that is:~~

~~(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and~~

~~(B) If the date postmarked on the envelope or certified mail receipt, or affixed by~~

~~the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.~~

~~(2) If IDEM, OAQ, and OES upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.~~

~~(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, and OES takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, and OES, any additional information identified as needed to process the application.~~

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

~~(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.~~

~~(b) Any application requesting an amendment or modification of this permit shall be submitted to:~~

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251~~

~~and~~

~~Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221~~

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

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

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

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

~~(1) The changes are not modifications under any provision of Title I of the Clean Air Act;~~

~~(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;~~

~~(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);~~

~~(4) The Permittee notifies the:~~

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

~~Indianapolis, Indiana 46204-2251~~

~~and~~

~~Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221~~

~~and~~

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

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

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

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

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

- ~~(c) — Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.~~

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

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

~~B.20 — Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][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, OES, U.S. EPA, or an authorized representative to perform the following:~~

- ~~(a) — Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;~~
- ~~(b) — As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;~~
- ~~(c) — As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;~~

- (d) ~~As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and~~
- (e) ~~As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.~~

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

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

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251~~

~~and~~

~~Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221~~

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

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

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

- (a) ~~The Permittee shall pay annual fees to IDEM, OAQ, or OES 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 317-233-4320 (ask for OAQ, Billing Licensing & Training Section), to determine the appropriate permit fee.~~

SECTION C ~~SOURCE OPERATION CONDITIONS~~

~~Entire Source~~

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

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

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

- ~~(a) Pursuant to 326 IAC 2-8:~~

- ~~(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve~~

~~(12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.~~

- ~~(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) 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.~~
- ~~(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.~~

~~C.2 Opacity [326 IAC 5-1]~~

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

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

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

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

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

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

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

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

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

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

~~C.7 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 IDEM 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
400 North Senate Avenue
Indianapolis, Indiana 46204-2251~~

~~and~~

~~Indianapolis Office of Environmental Services
Asbestos Section
2700 South Belmont Avenue
Indianapolis, IN 46221~~

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

~~(e) Procedures for Asbestos Emission Control~~

~~The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~

~~(f) Demolition and renovation~~

~~The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).~~

~~(g) Indiana Accredited Asbestos Inspector~~

~~The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.~~

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

~~C.8 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, and OES.~~

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

~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251~~

~~and~~

~~Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221~~

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

- ~~(b) The Permittee shall notify IDEM, OAQ, and OES of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- ~~(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and OES, if the Permittee submits to IDEM, OAQ, and OES a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.~~

Compliance Requirements [326 IAC 2-1.1-11]

~~C.9 Compliance Requirements [326 IAC 2-1.1-11]~~

~~The IDEM 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 IDEM Commissioner or the U. S. EPA.

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

~~C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]~~

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

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

~~C.11 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.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]~~

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

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

~~C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]~~

~~Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):~~

- ~~(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.~~
- ~~(b) These ERPs shall be submitted for approval to:~~

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251~~

~~and~~

~~Office of Environmental Services
Air Compliance
2700 South Belmont Avenue~~

Indianapolis, Indiana 46224

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

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

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

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

~~(a) — The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, and OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:~~

~~(1) — Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.~~

~~(2) — If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents, such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~

~~(b) — For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~

~~(1) — Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~

~~(2) — If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~

~~(3) — If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ, and OES of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~

~~(4) — Failure to take reasonable response steps shall be considered a deviation from the permit.~~

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

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

~~(2) — The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has~~

previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

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

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

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

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

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

~~C.17 — 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 OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the OES Administrator 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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- (b) ~~The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:~~
- ~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2254~~
- and
- ~~Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46224~~
- (c) ~~Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.~~
- (d) ~~Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- (e) ~~Reporting periods are based on calendar years.~~

Stratospheric Ozone Protection

C.19 ~~Compliance with 40 CFR 82 and 326 IAC 22-11~~

~~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 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, F097-17400-00135, 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 and OES, 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]

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

B.5 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 and OES, within a reasonable time, any information that IDEM, OAQ and OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and OES copies of records required to be kept by this permit.

- (b) For information furnished by the Permittee to IDEM, OAQ and OES, 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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

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

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

- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ and OES 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 and OES may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.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 prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

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

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

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and OES. IDEM, OAQ and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The 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 OES within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM, OAQ, telephone number: 1-800-451-6027(ask for Office of Air Quality, Compliance Section), or 317-233-0178 (ask for Compliance Section), Facsimile number: 317-233-6865; and
Indianapolis Office of Environmental Services phone: (317) 327-2234 (ask for OES Air Compliance Section),
Facsimile number: (317) 327-2274.
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

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

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F097-21739-00135 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
Indianapolis, Indiana 46204-2251

and

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

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 and OES determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ and OES to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ and OES at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ and OES 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 OES and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by 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
Indianapolis, Indiana 46204-2251

and

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

- (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 and OES 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 and OES takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and OES any additional information identified as 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
Indianapolis, Indiana 46204-2251
- and
- Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221
- 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
Indianapolis, Indiana 46204-2251
- and
- Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221
- 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 and OES in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade 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 and 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, and OES 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
Indianapolis, Indiana 46204-2251

and

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

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 and OES 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 and OES 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 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18)

months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.25 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 Overall Source Limit [326 IAC 2-8]

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

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
 - (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.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

C.6 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 IDEM Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

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

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).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

C.7 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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 and OES.

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

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

and

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

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 and OES 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 and OES not later than forty-five (45) days after the completion of the testing. An

extension may be granted by IDEM, OAQ and OES if the Permittee submits to IDEM, OAQ and OES a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

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

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.10 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.11 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 pressure gauge or other 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.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

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

within 180 days from the date on which this source commences operation.

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

- (c) If the ERP is disapproved by IDEM, OAQ and OES, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

- (f) Upon direct notification by IDEM, OAQ and OES that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.13 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.14 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; and/or
 - (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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

The response action documents submitted pursuant to this condition do require the certification by 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.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the IDEM Commissioner or OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the IDEM Commissioner or OES Administrator 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.17 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
Indianapolis, Indiana 46204-2251

and

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. 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 and OES. The general public may request this information from the IDEM, OAQ and OES under 326 IAC 17.1.

Stratospheric Ozone Protection

C.18 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.

Proposed Change# 4:

This table descriptive information has been updated to match the description in Section A, condition A.2.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) Irvin Industries Horizontal Roller Blast Machine identified as Emission Unit ID Horizontal Roller Blast Machine. Model number 100-1m-10. Maximum unit capacity of 3,900 pounds of steel shot/grit cycled per hour. Equipped with one (1) reverse flow baghouse for particulate matter control identified as Control Equipment ID CE #1 and exhausting at 8,700 acfm at to Stack/Vent ID CE #1. Installation date of 1982, modified last in 2006.

Proposed Change# 5:

Regulation 326 IAC 6-1-2 was repealed and 326 IAC 6.5-1-2 was adopted, on August 10, 2005. This is reflected in the D.1.1 condition below.

D.1.1 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Nonattainment Area Particulate Limitations: Specified), PM emissions from Emission Unit ID Horizontal Roller Blast Machine shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

Proposed Change# 6:

In order to address the Permittee's request of adding a new emission unit (3rd spray painting gun), and to show that the PM-10 limitation is federally enforceable, Condition D.1.2, is being modified as follows:

D.1.2 Particulate Matter Ten (10) Microns or Less (PM-10) [326 IAC 2-8]

Pursuant to 326 IAC 2-8, Federally Enforceable State Operating Program, PM-10 emissions from Emission Unit ID Horizontal Roller Blast Machine, shall not exceed ~~0.03 grain per dry standard cubic foot of exhaust air, which is equivalent to 9.9 tons per year of PM10 emissions, based on the air flow rate of 8,760 acfm,~~ **2.25 pounds per hour (lb/hr) and thus are limited to less than 40 tons per year (tpy).**

Limiting PM10 emissions to less than 0.03 gr/dscf is equivalent to less than 2.3 pounds of PM10 emissions per hour. Compliance with this PM-10 limitation, in combination with PM-10 emissions PTE from Spray Painting Operation of 19.82 ton/yr, and all Insignificant Activities PM-10 PTE of 4.56 ton/yr shall limit source wide PM-10 emissions to less than the major source threshold. **This limit, combined with Emission Unit ID Spray Painting PM-10 potential emissions (PTE) of 42.67 tpy and Insignificant Activities PM-10 PTE of 10.8 tpy, enforceably limits source-wide PM-10 emissions to less than the major source threshold of one hundred (100) tpy. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit), do not apply.**

Compliance with this FESOP limit renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

Proposed Change# 7:

The D.1.3 condition (Preventive Maintenance Plan) has been modified as stated below.

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

A Preventive Maintenance Plan, in accordance with Section B.12 1 - Preventive Maintenance Plan, of this permit, is required for **the Emission Unit ID Horizontal Roller Blast Machine and its emission control devices.**

Proposed Change# 8:

The D.1.4 condition in regards to the testing requirements remains the same as in the FESOP renewal. For clarification, this FESOP renewal number has been specified in this condition.

D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of FESOP, **F097-17400-00135**, in order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM and PM-10 testing for Emission Unit ID Horizontal Roller Blast Machine utilizing methods as approved by the IDEM Commissioner **and OES Administrator**. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Condition C-8 7- Performance Testing.

Proposed Change# 9:

The particulate matter condition specified below has been moved to the Compliance Determination Requirements, and has been deleted out of the Compliance Monitoring Requirements.

D.1.5 Particulate Matter (PM) [326 IAC 6.5-1]

The control equipment for PM for Emission Unit ID Horizontal Roller Blast Machine, identified as CE #1, shall be in operation at all times when Emission Unit Horizontal Roller Blast Machine is in operation.

~~D.1.5 Particulate Matter (PM)~~

~~The control equipment for PM for Emission Unit ID Horizontal Roller Blast Machine, identified as CE #1, shall be in operation at all times when Emission Unit Horizontal Roller Blast Machine is in operation.~~

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

Proposed Change# 10:

Upon further review, IDEM and OES have determined that once per day monitoring of visible emission notations is generally sufficient to ensure proper operation of the control device. IDEM and OES has determined that monitoring these parameters once per day is sufficient to satisfy the requirements of the 326 IAC 2-8-4.

D.1.6 Visible Emissions Notations

- (a) Once per ~~shift~~ **day** visible emission notations of the CE #1 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- ***
- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports shall be considered a violation of this permit.~~

If abnormal emissions 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 the section mentioned above, shall be considered a deviation from this permit.

Proposed Change# 11:

Upon further review, IDEM and OES have determined that once per day monitoring of visible emission notations is generally sufficient to ensure proper operation of the control device. IDEM and OES have determined that monitoring these parameters once per day is sufficient to satisfy the requirements of 326 IAC 2-8-4.

D.1.7 **Baghouse** Parametric Monitoring - Pressure Readings

- (a) The Permittee shall record the pressure drop across the baghouse controlling the blasting machine, identified as Control Equipment ID CE #1, at least once per ~~shift~~ **day** when the blasting machine is in operation. ~~Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of~~ is outside the normal range of 1.0 to 6.0 inches of water or a range established during the latest stack test. ~~The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.~~ **When for any one reading, the pressure drop across the baghouse shall be maintained within the range of** the normal range of 1.0 to 6.0 inches of water or a range established during the latest stack test. ~~the Permittee shall take reasonable 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.~~
- (b) **The instrument used for determining the pressure shall comply with Section C - Instrument Specifications of this permit, shall be subject to approval by IDEM, OAQ and OES, and shall be calibrated at least once every six (6) months.**

Proposed Change# 12:

Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the D.1.8 condition requiring control device inspections have been removed from the permit. In addition, the requirement to keep records of the inspections from condition D.1.10 (c) and (d), has been removed. (See Proposed Change #14.)

~~D.1.8~~ **Baghouse Inspections**

~~An inspection shall be performed each calendar quarter of all bags controlling the process when venting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

Proposed Change# 13:

This condition has been expanded to differentiate between single and multi-compartment baghouses, and type of processes. For multi-compartment baghouses, the permit will not specify what actions the permittee needs to take in response to a broken bag. However, a requirement has been added to Condition D.1.9, requiring the Permittee to notify IDEM and OES if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM and OES to take any appropriate actions, if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

~~D.1.9~~ **Broken or Failed Bag Detection**

In the event that bag failure has been observed:

- (a) ~~For~~ **In the event that bag failure is observed in a multi-compartment baghouse,** ~~the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations will continue for after bag failure is observed and it will be 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 and OES of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance~~

monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For a single compartment baghouses, controlling **emissions from a process operated continuously**, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then a failed units and the associated process ~~will~~ **shall** be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (c) **For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down no later than the completion of the processing of the material in the line. 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).**

Proposed Change# 14:

See D.1.6 (See Proposed Change# 10 and Proposed Change #12) condition for a more detailed comment explanation.

D.1.409 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of once per ~~shift~~ **day** visible emission notations of Emission Unit ID Horizontal Roller Blast Machine stack exhaust, when the blasting machine is in operation.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of once per ~~shift~~ **day** pressure readings of Control Equipment ID CE #1, when the blasting machine is in operation.
- (c) ~~To document compliance with Condition D.1.8, the Permittee shall maintain records of the results of the baghouse inspections required under Condition D.1.8.~~
- (d) ~~To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~
- (c) **All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

Proposed Change# 15:

This table description has been changed to reflect the addition of the 3rd airless spray painting gun and the change in the maximum rated capacity to apply coatings, taking in consideration all 3 spray painting guns, to the Graco Spray Painting Operation as follows:

Section D.2 FACILITY OPERATION CONDITIONS

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

- (b) One (1) Graco Spray Painting Operation utilizing ~~two (2)~~ **three (3)** airless spray painting guns identified as Emission Unit ID Spray Painting. Fabricated steel beams and other miscellaneous metal parts are spray painted inside the manufacturing building and are not directly exhausted to any control equipment or Stack/Vent ID. Maximum rated capacity to apply coatings is 1.0 gallon of coating per unit and ~~4.5~~ **3.23** units per hour. Emission Unit ID Spray Painting includes the use of Hydro-Zinc, Theme-Zinc, and F.C. Typoxy coatings, used unthinned, i.e. no thinners or solvents are used in the coating. Installation date of 1905, modified last in 2007.

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

Proposed Change# 16:

The hazardous air pollutant emissions have been changed to reflect a 9.8 tpy single HAP limitation per consecutive 12 month period, with compliance determined each month.

D.2.2 Hazardous Air Pollutants (HAP) [326 IAC 2-8] [326 IAC 2-4.1] [40 CFR 63]

Pursuant to FESOP 097-17400-00135 and 326 IAC 2-8, the hazardous air pollutant (HAP) emissions shall be limited as follows:

- (a) Usage of **any single HAP** coating shall be limited such that per 12 consecutive months, with compliance determined at the end of each month, **to less than nine and eight-tenths (9.8) 10 tons of a single HAP is delivered to the applicator, per twelve (12) consecutive months for the Spray Painting operation, such that any single HAP emission from the entire source shall be below ten (10) tons per year and any combination of HAPs shall be below twenty-five (25) tpy, with compliance determined at the end of each month. Therefore, PTE is enforceably restricted to less than the major source threshold. Therefore, Compliance with this FESOP limit renders the requirements of 326 IAC 2-7, 326 IAC 2.4.1 and 40 CFR 63 shall not apply., not applicable.**
- (b) Any combination of HAPs delivered to the applicator shall be less than twsnety five (25) tons per twelve (12) consecutive month period.

Therefore, the requirements of 326 IAC 2-7 shall not apply.

Proposed Change# 17:

The Permittee is subject to the particulate matter regulations for the Spray Paining operation, and this regulation has been incorporated below:

D.2.3 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations except Lake County), PM emissions from the Emission Unit ID Spray Painting shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

Proposed Change# 18:

The PMP condition has been revised to include emission control devices.

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

A Preventive Maintenance Plan (PMP), in accordance with Section B.12 - Preventive Maintenance Plan, of this permit, is required for this facility **and its emission control devices.**

Proposed Change# 19:

In order that compliance with the VOC and HAP content and usage limitations be determined, conditions D.2.5 and D.2.6 were added as follows:

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

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, and OES reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.6 Hazardous Air Pollutants (HAP) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the HAP content and usage limitations contained in Conditions D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or

obtaining from the manufacturer the copies of the “as supplied” and “as applied” HAP data sheets. IDEM, OAQ, and OES reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Proposed Change# 20:

The change in reference to the Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, has been revised to reflect the new condition title of Response to Excursions or Exceedances. The additional inspections for the Preventive Maintenance Plan have been removed.

D.2.4- 7 Monitoring

Should overspray emissions from Emission Unit ID Spray Painting be directed to the outside air:

- (a) Weekly observations shall be made of the overspray from surface coating booth stack while one or more of the booths are in operation ~~exhaust while surface coating is in operation, should emissions be directed to the outside stack.~~ **If a condition exists which would result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Condition C.15 - ~~Compliance Response Plan – Preparation, Implementation, Records, and Reports,~~ **Response to Excursions or Exceedances,** shall be considered a ~~violation of~~ **deviation from** this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and/or the nearby ground. ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when~~ **When there is** a noticeable change in overspray emissions, or **when** evidence of overspray emissions is observed, **the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.** ~~The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.~~ Failure to take response steps in accordance with Condition C.15 - ~~Compliance Response Plan – Preparation, Implementation, Records, and Reports,~~ **Response to Excursions or Exceedances,** shall be considered a ~~violation of~~ **deviation from** this permit.
- ~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

Proposed Change#21:

This condition had been incorrectly numbered; it has been renumbered to reflect the proper subsections. Any reference to the Preventive Maintenance Plan has been deleted.

D.2.5 8 Volatile Organic Compound (VOC) Content and Usage

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through ~~(6 5)~~ below. Records maintained for (1) through ~~(6 5)~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.2.1.

 - ~~(5 4)~~ The total VOC usage for each month; and
 - ~~(6 5)~~ The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.4-7, the Permittee shall maintain a log of weekly overspray observations, **and** monthly inspections., ~~and these additional inspections prescribed by the Preventive Maintenance Plan.~~

D.2.6 9 Hazardous Air Pollutants (HAPs)

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limit(s) established in Condition D.2.2.

- (3) ~~The~~ **Any single HAP content (weight percent) of each material used usage for each month;**
- (4) The weight of **any single HAPs** emitted for each calendar month, considering capture and control efficiency, if applicable;

- (b) All records shall be maintained in accordance with Section ~~C.18~~ - General Record Keeping Requirements, of this permit.

Proposed Change# 22:

Record keeping and reporting conditions have been changed in order to reflect the changes in compliance monitoring and determination. The requirement to maintain records of the Preventive Maintenance Plan inspections has been taken out, and a sentence added in regards to the proper reports being certified by the authorized individual.

D.2.710 Record keeping and Reporting Requirements

- (a) To document compliance with Condition D.2.5 **7 and D.2.8**, the Permittee shall maintain records of weekly observations of the overspray from surface coating **booth stacks exhaust while one or more of the booths are in operation.** ~~surface coating is in operation, should emissions be directed to the outside stack.~~
- (b) ~~To document compliance with Condition D.2.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~
- (e-b) A quarterly summary to document compliance with operation condition D.2.2 - Hazardous Air Pollutants, shall be submitted to the address(es) listed in Condition C ~~49~~ - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported. **The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

Proposed Change# 23:

The insignificant activities in Section D.3 table have been modified to reflect the changes in Condition A.3.

SECTION D.3 EMISSION UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-8-4(10)]- Insignificant Activities:	
(c)	This stationary source also includes the following insignificant activities: ***
(3)	The following equipment related to manufacturing activities not resulting in negligible the emissions of HAPs: brazing equipment, flame cutting torches, soldering equipment, and welding equipment. ***
(7)	Other activities not previously identified (by category) with emissions equal to or less than Insignificant Activity thresholds: drilling holes, saw cutting, shearing, grinding, flame cutting and/or punching metal steel -beams and plates. ***

Proposed Change# 24:

Regulation 326 IAC 6-1-2 has been repealed and a new regulation under 326 IAC 6.5-1-2 has been adopted by the Indiana Air Pollution Control Board on August 10, 2005, as stated below:

D.3.1 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations except Lake County), PM emissions from insignificant activities shall not exceed 0.03 per dry standard cubic foot of exhaust air.

Appendix A: Emission Calculations
Coatings

Company Name: Geiger & Peters, Inc.
Address City IN Zip: 761 South Sherman Drive, Indianapolis, Indiana 46203
Permit #: F 097-17400-00135
1st Significant Revision #: F 097-21739-00135
Permit Reviewer: Carmen Bugay, 12/06

Coatings Properties

Hydro zinc 91-H20

As per the MSDS provided by the manufacturer (Tnemec), the Hydro-Zinc 91-H20 has an unthinned VOC content of 2.67 lbs/gallon.
As per the MSDS provided by the manufacturer (Tnemec), the Hydro-Zinc 91-H20 has an unthinned solids content of 63%.
As per the MSDS provided by the manufacturer (Tnemec), the Hydro-Zinc 91-H20 weighs 23.94 lbs per gallons as applied.
As applied:

2.67 pounds of VOC per gallon

To calculate the HAP content of Hydro Zinc 91-H20 a mass balance is performed using the HAP content of the two component mixture
F091-0H20A F091-0H20B

9.1213 lbs/gal 58.7993 lbs/gal

Mixed in a 3:1 ratio

Part A contains:

Ethyl benzene

8.22% weight percent of part A

Xylene

32.91% weight percent of part A

As applied:

Ethyl benzene = (% Ethyl benzene of part A x 9.1213 lb/gal) * 2.8 gallons of part A makes 4 gallons as applied

= **0.52** lbs of ethyl benzene / gallon

Xylene = (% Xylene of part A x 9.1213 lb/gal) * 2.8 gallons of part A makes 4 gallons as applied

= **2.10** lbs of xylene / gallon

PTE PM Emissions: (80% transfer efficiency)

23.94 lbs/gal

63% solids

15.0822 lbs of solids / gallon

4.52466 lbs PM / hour

19.8180108 tons PM / year

Tneme-Zinc 90-97

As per the MSDS provided by the manufacturer (Tnemec), the Tneme-Zinc 90-97 has an unthinned VOC content of 2.67 lbs/gallon.
As per the MSDS provided by the manufacturer (Tnemec), the Tneme-Zinc 90-97 has an unthinned solids content of 63%.

As per the MSDS provided by the manufacturer (Tnemec), the Tneme-Zinc 90-97 weighs 23.94 lbs per gallon.

As applied:

2.67 pounds of VOC per gallon

To calculate the HAP content of Tneme Zinc 90-97 a mass balance is performed using the HAP content of the two component mixture

F090-0097A F090-0097B

8.9615 lbs/gal 58.7993 lbs/gal

3.793 lbs VOC per gal 0 lbs VOC per gal

42.328 % VOC by weight 0 % VOC by weight

Mixed in a 3:1 ratio

Part A contains:

Ethyl benzene

8.45% weight percent of part A

Xylene

33.84% weight percent of part A

As applied:

Appendix A: Emission Calculations - Coatings continued

Geiger & Peters, Inc.

1st Significant Revision#: F 097-21739-00135

Ethyl benzene = (% Ethyl benzene of part A x 8.9615 lb/gal) * 2.8 gallons of part makes 4 gallons as applied

= **0.53** lbs of ethyl benzene / gallon

Xylene = (% Xylene of part A x 8.9615 lb/gal) * 2.8 gallons of part A makes 4 gallons as applied

= **2.12** lbs of xylene / gallon

PTE PM emissions: (80% transfer efficiency)

23.94 lbs/gallon

63% solids

15.0822 lbs of solids / gallon

4.52466 lbs PM / hour

19.8180108 tons PM / year

F.C. Typoxy

As per the MSDS provided by the manufacturer (Tnemec), the F.C. Typoxy has an unthinned VOC content of 3.02 lbs/gallon.

As applied:

3.02 pounds of VOC per gallon

To calculate the HAP content of F.C. Typoxy a mass balance is performed using the HAP content of the two component mixture

F027-11WHA

14.5885 lbs/gal

F027-0027B

12.7603 lbs/gal

Mixed in a 1:1 ratio

Part A contains:

Xylene

14.35% weight percent of part A

Part B contains:

Ethyl benzene

3.23% weight percent of part B

Xylene

20.04% weight percent of part B

As applied:

Ethyl benzene = (% Ethyl benzene of part B x 12.7603 lb/gal) * 1 parts B / 2 total parts

= **0.21** lbs of ethyl benzene / gallon

Xylene = [(% Xylene of part A x 14.5885 lb/gal) x 1 part A + (% Ethyl benzene of part B x 12.7603 lb/gal) x 1 part B] / 2 total parts

= **2.33** lbs of xylene / gallon

PTE PM emissions: (80% transfer efficiency)

13.71 lbs/gallon

58% solids

7.9518 lbs of solids / gallon

2.38554 lbs PM / hour

10.4486652 tons PM / year

Appendix A: Emission Calculations
Surface Coating - 2 existing guns

Company Name: Geiger & Peters, Inc.
 Address City IN Zip: 761 South Sherman Drive, Indianapolis, Indiana 46203
 Permit #: F 097-17400-00135
 1st Significant Revision #: F 097-21739-00135
 Permit Reviewer: Carmen Bugay, 12/06

Spray Painting PTE (as supplied)

Max capacity stated as:

- 1 gallon per unit (ton)
- 1.5 units (tons) / hr
- 80 % Transfer Efficiency

Potential VOC Emissions (worst case)

Coating	lbs volatile/gal coat	lbs / hr VOC PTE and actual	tons / yr VOC PTE	Actual tons / yr VOC
Hydro zinc	2.67	4.01	17.54	5.00
Tneme-Zinc	2.67	4.01	17.54	5.00
F.C. Typoxy	3.02	4.53	19.84	5.65

PM/PM10 Emissions

Coating	lbs solid / gal coat	lb / hr PM PTE and actual	tons / yr PM PTE	Actual tons / yr PM
Hydro zinc	15.082	4.525	19.818	5.647
Tneme-Zinc	15.082	4.525	19.818	5.647
F.C. Typoxy	7.952	2.386	10.449	2.977

Potential HAP Emissions (worst case)

Coating	Maximum Usage	Ethyl benzene	Xylene	lbs /hr Ethyl benzene	lbs / hr Xylene	lbs / hr combined HAPs	tons / yr Ethyl benzene PTE	tons / yr Xylene PTE	tons / yr combined HAPs
	gal/yr	lbs / gallon	lbs / gallon						
Hydro zinc	13,140	0.52	2.10	0.79	3.15	3.94	3.45	13.81	17.25
Tneme-Zinc	13,140	0.53	2.12	0.80	3.18	3.98	3.48	13.95	17.43
F.C. Typoxy	13,140	0.21	2.33	0.31	3.49	3.80	1.35	15.28	16.63

Note:

Painting is conducted for **one shift per day, six days per week**.
 The coating systems are used unthinned, i.e. **no thinner or solvent is added to the coating**.

Limited HAP (worst case - Xylene) Emissions:

	Limited Xylene Emission, less than ton/yr	Xylene Content, lb/gal	Limited usage, less than, gal/yr	Equivalency to F.C. Typoxy, gal/gal	Emissions at limited coatings usage, ton/yr		
					VOC Emissions, less than	Combined HAP Emissions, less than	PM/PM10
Hydro zinc	10	2.10	9,518	0.904	12.7	12.498	14.4
Tneme-Zinc	10	2.12	9,422	0.913	12.6	12.497	14.2
F.C. Typoxy	10	2.33	8,601	1	13.0	10.886	6.8

**Appendix A: Emission Calculations
Surface Coating - New Gun**

Company Name: Geiger & Peters, Inc.
Address City IN Zip: 761 South Sherman Drive, Indianapolis, Indiana 46203
Permit #: F 097-17400-00135
1st Significant Revision #: F 097-21739-00135
Permit Reviewer: Carmen Bugay, 12/06

Spray Painting PTE (as supplied)

Max capacity stated as:

1 gallon per unit (ton)
1.73 units (tons) / hr
80 % Transfer Efficiency

Potential VOC Emissions (worst case)

Coating	lbs volatile/gal coat	lbs / hr VOC PTE and actual	tons / yr VOC PTE	Actual tons / yr VOC
Hydro zinc	2.67	4.62	20.23	5.76
Tneme-Zinc	2.67	4.62	20.23	5.76
F.C. Typoxy	3.02	5.22	22.88	6.52

PM/PM10 Emissions

Coating	lbs solid / gal coat	lb / hr PM PTE and actual	tons / yr PM PTE	Actual tons / yr PM
Hydro zinc	15.08	5.218	22.857	6.513
Tneme-Zinc	15.08	5.218	22.857	6.513
F.C. Typoxy	7.95	2.751	12.051	3.434

Potential HAP Emissions (worst case)

Coating	Maximum Usage	Ethyl benzene	Xylene	lbs /hr Ethyl benzene	lbs / hr Xylene	lbs / hr combined HAPs	tons / yr Ethyl benzene PTE	tons / yr Xylene PTE	tons / yr combined HAPs
	gal/yr	lbs / gallon	lbs / gallon						
Hydro zinc	15,155	0.52	2.10	0.91	3.64	4.54	3.98	15.92	19.90
Tneme-Zinc	15,155	0.53	2.12	0.92	3.67	4.59	4.02	16.09	20.10
F.C. Typoxy	15,155	0.21	2.33	0.36	4.02	4.38	1.56	17.62	19.18

Note:

Painting is conducted for one shift per day, six days per week.

The coating systems are used unthinned, i.e. no thinner or solvent is added to the coating.

Limited HAP (worst case - Xylene) Emissions:

	Emissions at limited coatings usage, ton/yr						
	Limited Xylene Emission, less than ton/yr	Xylene Content, lb/gal	Limited usage, less than, gal/yr	Equivalency to F.C. Typoxy, gal/gal	VOC Emissions, less than	Combined HAP Emissions, less than	PM/PM10
Hydro zinc	9.8	2.10	9,328	0.904	12.5	12.498	14.1
Tneme-Zinc	9.8	2.12	9,233	0.913	12.3	12.497	13.9
F.C. Typoxy	9.8	2.33	8,429	1.000	12.7	10.886	6.7

**Appendix A: Emission Calculations
All Surface Coating**

Company Name: Geiger & Peters, Inc.
Address City IN Zip: 761 South Sherman Drive, Indianapolis, Indiana 46203
Permit #: 097-17400-00135
1st Significant Revision #: F 097-21739-00135
Permit Reviewer: Carmen Bugay, 12/06

Spray Painting PTE (as supplied)
Max capacity stated as:
1 gallon per unit (ton)
3.23 units (tons) / hr
80 % Transfer Efficiency

Potential VOC Emissions (worst case)

Coating	lbs volatile/gal coat	lbs / hr VOC PTE and actual	tons / yr VOC PTE	Actual tons / yr VOC
Hydro zinc	2.67	8.62	37.77	10.76
Tneme-Zinc	2.67	8.62	37.77	10.76
F.C. Typoxy	3.02	9.75	42.73	12.17

PM/PM10 Emissions

Coating	lbs solid / gal coat	lb / hr PM PTE and actual	tons / yr PM PTE
Hydro zinc	15.08	9.743	42.675
Tneme-Zinc	15.08	9.743	42.675
F.C. Typoxy	7.95	5.137	22.499

Potential HAP Emissions (worst case)

Coating	Maximum Usage	Ethyl benzene	Xylene	lbs /hr Ethyl benzene	lbs / hr Xylene	lbs / hr combined HAPs	tons / yr Ethyl benzene PTE	tons / yr Xylene PTE	tons / yr combined HAPs
	gal/yr	lbs / gallon	lbs / gallon						
Hydro zinc	28,295	0.52	2.10	1.70	6.79	8.48	7.43	29.73	37.15
Tneme-Zinc	28,295	0.53	2.12	1.71	6.86	8.57	7.50	30.03	37.53
F.C. Typoxy	28,295	0.21	2.33	0.67	7.51	8.18	2.92	32.90	35.81

Note:
Painting is conducted for one shift per day, six days per week.
The coating systems are used unthinned, i.e. no thinner or solvent is added to the coating.

Limited HAP (worst case - Xylene) Emissions:

	Limited Xylene Emission, less than ton/yr	Xylene Content, lb/gal	Limited usage, less than, gal/yr	Equivalency to F.C. Typoxy, gal/gal	Emissions at limited coatings usage, ton/yr	
					VOC Emissions, less than	Combined HAP Emissions, less than
Hydro zinc	9.8	2.10	9,328	0.904	12.5	12.498
Tneme-Zinc	9.8	2.12	9,233	0.913	12.3	12.497
F.C. Typoxy	9.8	2.33	8,429	1.000	12.7	10.886

Actual tons / yr PM
12.159
12.159
6.411

PM/PM10
14.1
13.9
6.7

Company Name: Geiger & Peters, Inc.
Address City IN Zip: 761 South Sherman Drive, Indianapolis, Indiana 46203
Permit #: F 097-17400-00135
1st Significant Revision #: F 097-21739-00135
Permit Reviewer: Carmen Bugay, 12/06

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1,170	1,336	1510	1680	1850	2030
3/4	1140	1420	1,670	1,915	2160	2400	2630	2880
1	2030	2460	2,900	3,340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)

FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =

D = Density of abrasive (lb/ft3) From Table 2 =

D1 = Density of sand (lb/ft3) =

ID = Actual nozzle internal diameter (in) =

ID1 = Nozzle internal diameter (in) from Table 3 =

NA

Flow Rate (FR) (lb/hr) = 3900.0 * per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Application of 3/16/98 * =

FR = Flow Rate (lb/hr) From Application of 3/16/98 * =

w = fraction of time of wet blasting =

N = number of nozzles =

EF = emission factor (lb PM 10/ lb abrasive) From Table 1 for Grit =

0.01036
3900.000
0 %
1
0.70000

Uncontrolled PM Emissions	40.4 lb/hr
=	177.0 ton/yr

Uncontrolled PM 10 Emissions	28.3 lb/hr
=	123.9 ton/yr

Estimated Actual Emissions based on 8 hr/day, 6 days/week

Uncontrolled actual PM Emissions	40.4 lb/hr
=	50.4 ton/yr

Estimated Actual Emissions based on 98% baghouse efficiency & 8760 hr

Controlled PM Emissions	0.8 lb/hr	0.011	gr/dscf
=	3.5 ton/yr		

METHODOLOGY

Emission Factors from Stappa Alapco, Section 3 "Abrasive Blasting"

@ 0.03gr/dscf & 8760 acfm:

Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs

Controlled PM10 Emissions	0.6 lb/hr	2.25 lb/hr
=	2.5 ton/yr	9.87 tons/yr

Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)² x (D/D1)

E = EF x FR x (1-w/200) x N

w should be entered in as a whole number (if w is 50%, enter 50)

* denotes source supplied the flow rate of steel shot/grit in the application received 3/16/98. Source also reported inlet dust concentration of 4714 grains/min.

4714 grains/min * lb/7000 grains x 60 min/hr = 40.4 lbs/hr of emissions uncontrolled.

40.4 lbs/hr / 3900 lbs shot cycled/hr = 0.01036 lbs PM emissions per pound of shot which is in line with Table 1 data.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Insignificant Activities - Small Industrial Heater**

Company Name: Geiger & Peters, Inc.
Address City IN Zip: 761 South Sherman Drive, Indianapolis, Indiana 46203
Permit #: F 097-17400-00135
1st Significant Revision #: F 097-21739-00135
Permit Reviewer: Carmen Bugay, 12/06

Heat Input Capacity
MMBtu/hr

7.0

Potential Throughput
MMCF/yr

61.2

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	0.058	0.233	0.018	3.062	0.168	2.572

*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

Hazardous Air Pollutants (HAPs) Emissions

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	0.0001	0.0000	0.0023	0.0551	0.0001

Single HAP
Hexane
0.0551

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	0.0000	0.0000	0.0000	0.0000	0.0001

Combined HAP total
0.0002

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

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

**Appendix A: Emissions Calculations
Kerosene Combustion Only
MM BTU/HR <100
Insignificant Activities - Small Industrial Heaters**

Company Name: Geiger & Peters, Inc.
Address City IN Zip: 761 South Sherman Drive, Indianapolis, Indiana 46203
Permit #: F 097-17400-00135
1st Significant Revision #: F 097-21739-00135
Permit Reviewer: Carmen Bugay, 12/06

Mobile Kerosene Heaters, natural gas fired

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.8

7.0

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	0.007	0.027	0.002	0.350	0.019	0.294

*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

Hazardous Air Pollutants (HAPs) Emissions

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	0.0000	0.0000	0.0003	0.0063	0.0000

Single HAP
Hexane
0.0063

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	0.0000	0.0000	0.0000	0.0000	0.0000

Combined HAP total
0.0121

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

Methodology

All emission factors are based on normal firing.
Kerosene Heating value = 135,000 BTU / gallon of kerosene burned
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 Factor for Kerosene is from AP 42, Appendix A, and AP-42 FIRE as lb per 1,000 gallons of kerosene

Emission (tons/yr) = Throughput (1 MMCF / 1,020 MMBtu) * (7.60 lb/MMCF) * (8,760 hours/year) x Emission Factor (lb/1,000 gallons) * (1,000,000 BTU/MMBTU)*1 ton/2,000 lbs)

Appendix A: Emissions Calculations
Insignificant Other Activities - Welding, Cutting, Drilling, etc.

Company Name: Geiger & Peters, Inc.
Address City IN Zip: 761 South Sherman Drive, Indianapolis, Indiana 46203
Permit Number: F 097-17400-00135
1st Significant Revision #: F 097-21739-00135
Reviewer: Carmen Bugay, 3/07

PROCESS	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/lb consumed)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Drilling, metal	2	2	0.5	0.0039	neg	neg	neg	0.0005	neg	neg	neg	neg
Punching, metal	1	2	5	0.0039	neg	neg	neg	0.0023	neg	neg	neg	neg
Grinding, metal	24	2	5	0.0039	neg	neg	neg	0.0562	neg	neg	neg	neg
Sawing, metal	3	2	5	0.0039	neg	neg	neg	0.0070	neg	neg	neg	neg

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Submerged Arc	0	0		0.0360	0.0110			0.0000	0.0000	0.0000	0.0000	0.0000
GMAW	27	0.3		0.0055	0.0005			0.0446	0.0041	0.0000	0.0000	0.0041
Stick (E7018 electrode)	0	0		0.0211	0.0009			0.0000	0.0000	0.0000	0.0000	0.0000
Tungsten Inert Gas (TIG)(carbon)	0	0		0.0055	0.0005			0.0000	0.0000	0.0000	0.0000	0.0000
Oxyacetylene(carbon steel)	0	0		0.0055	0.0005			0.0000	0.0000	0.0000	0.0000	0.0000

PROCESS	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	0	0	0	0.1622	0.0005	0.0001	0.0003	0.0000	0.0000	0.0000	0.0000	0.0000
Oxymethane	26	1.0	18	0.0815	0.0002		0.0002	2.2885	0.0056	0.0000	0.0056	0.0112
Plasma**	1	1.0	30	0.0039				0.0070	0.0000	0.0000	0.0000	0.0000
EMISSION TOTALS												
Potential Emissions lbs/hr								2.4061	0.0097	0.0000	0.0056	0.0153
Potential Emissions lbs/day								57.7459	0.2320	0.0000	0.1348	0.3668
Potential Emissions tons/year								10.5386	0.0423	0.0000	0.0246	0.0669

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

** No AP-42 emission factor available for plasma cutting. Emission Factor for plasma cutting is from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted).

Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

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

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

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

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

**Appendix A: Emission Calculations
Emissions Summary**

Company Name: Geiger & Peters, Inc.
Address City IN Zip: 761 South Sherman Drive, Indianapolis, Indiana 46203
Permit #: F 097-17400-00135
1st Significant Revision #: F 097-21739-00135
Permit Reviewer: Carmen Bugay, 12/06

Unrestricted Potential to Emit

	P M		PM 10		VOC		Highest Single HAP		Combined lbs/day	HAP tons/yr	SO2 tons/yr	NOx tons/yr	CO tons/yr
	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr					
Horizontal Roller Blast Machine	969.60	176.95	678.72	123.87	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Spray Painting Operation	233.8	42.67	233.8	42.67	108.7	42.73	83.7	Xylene 32.9	205.7	37.5	0.0000	0.0000	0.0000
Insignificant Activities													
Natural Gas	0.319	0.058	1.275	0.233	0.923	0.168	0.302	Hexane 0.055	0.317	0.058	0.0184	3.0616	2.5718
Kerosene	0.036	0.007	0.146	0.027	0.106	0.019	0.035	Hexane 0.006	0.036	0.007	0.0021	0.3504	0.2943
Others	57.7	10.54	57.7	10.54			0.232	Magnesium 0.042	0.367	0.067	0.0000	0.0000	0.0000
Total:	1261.5	230.2	971.7	177.3	109.7	42.91	84.3	Total single 32.9	206.4	37.7	0.020	3.412	2.866

326 IAC 6.5-1-2 (Nonattainment Area Particulate Limitations)

	Air Flow, dscfm	Grainload., gr/dscf	Limited PM/PM10 Emissions	
			lb/hr	ton/yr
Horizontal Roller Blast Machine	8,780	0.03	2.258	9.889

Limited Potential to Emit (326 IAC 2-8)

	P M		PM 10		VOC		Highest Any Single HAP		Combined lbs/day	HAP tons/yr	SO2 tons/yr	NOx tons/yr	CO tons/yr
	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr					
Horizontal Roller Blast Machine lb/hr	969.6	176.95	412.8	40.00	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Spray Painting Operation	233.8	42.67	233.8	42.67	234.1	42.73	53.7	Xylene < 9.8	94.8	< 17.3	0.000	0.000	0.000
Insignificant Activities:													
1) Nat. Gas Combustion	0.319	0.058	1.275	0.233	0.923	0.168	0.302	Hexane 0.055	0.317	0.058	0.0184	3.0616	2.5718
2) Kerosene Combustion	0.036	0.007	0.146	0.027	0.106	0.019	0.035	Hexane 0.006	0.036	0.007	0.0021	0.3504	0.2943
3) Others	57.7	10.54	57.7	10.54	0.000	0.000	0.232	Magnesium 0.042	0.367	0.067	0.000	0.000	0.000
Total:	1261.5	230.23	705.8	93.47	235.1	42.91	54.3	< 10.0	95.5	< 25.0	0.020	3.412	2.866