



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant
DATE: December 16, 2005
RE: Padgett, Inc / 043-21949-00049
FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER-MOD.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
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December 16, 2005

Mr. Mark Neff
Padgett, Inc.
P.O. Box 1375
New Albany, IN 47151

Re: **043-21949-00049**
First Minor Revision to
FESOP 043-16746-00049

Dear Mr. Neff:

Padgett, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) F 043-16746-00049 on May 20, 2004 for a stationary metal products fabrication source located at 901 E. Fourth St., New Albany, Indiana 47150. A letter requesting changes to this permit was received on October 21, 2005. Pursuant to the provisions of 326 IAC 2-8-11.1 a Minor Permit Revision to this permit is hereby approved as described in the attached Technical Support Document.

The revision consists of the construction and operation of one (1) paint booth, identified as EU-08, to be installed in 2006, equipped with one (1) airless HVLP spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 8A and 8B, capacity: 3,600 pounds of metal beams and parts per hour.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
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 Office of Air Quality (OAQ).
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 (Revocation), the Commissioner 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.

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.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised FESOP, with all revisions and amendments made to it, is being provided.

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 Brian J. Pedersen, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by

Nysa L. James, Section Chief
Permits Branch
Office of Air Quality

Attachments

BJP/MES

cc: File - Floyd County
U.S. EPA, Region V
Floyd County Health Department
Indianapolis Offices
Air Compliance Section Inspector - Ray Schick
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michele Boner
Mr. R. J. Padgett



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**FEDERALLY ENFORCEABLE STATE
 OPERATING PERMIT (FESOP) RENEWAL
 OFFICE OF AIR QUALITY**

**Padgett, Inc.
 901 E. Fourth Street
 New Albany, Indiana 47150**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 043-16746-00049	
Issued by: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: May 20, 2004 Expiration Date: May 20, 2009

Minor Permit Revision No.: 043-21949-00049	Pages Affected: 15, 24-27, and 39-43
Original signed by: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: December 16, 2005 Expiration Date: May 20, 2009

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary metal products fabrication source.

Authorized individual:	Vice President
Source Address:	901 E. Fourth Street, New Albany, Indiana 47150
Mailing Address:	P.O. Box 1375, New Albany, Indiana 47151
General Source Phone:	(812) 945-1299
SIC Code:	3441
Source Location Status:	Floyd County
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) paint booth, identified as EU-01, constructed in 1999, equipped with one (1) airless spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 01 A and B, capacity: 3,600 pounds of metal beams and parts per hour.
- (b) One (1) paint booth, identified as EU-05, constructed in 1983, equipped with one (1) airless HVLP spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 03, 04 and 05, capacity: 3,600 pounds of metal beams and parts per hour.
- (c) One (1) paint booth, identified as EU-07, constructed in 2002, equipped with one (1) airless HVLP spray gun and a built-in dry filter system, exhausting to Stack S/V 07, capacity: 2,500 pounds of metal parts per hour.
- (d) One (1) sand abrasive booth, identified as EU-02, constructed in 1986, equipped with a cartridge dust collector for particulate control and exhausting to Stack S/V 02, capacity: 625 pounds of sand per hour and 16,914 pounds of metal parts per hour.
- (e) One (1) mechanical blast unit, identified as EU-03, constructed in 1999, equipped with a dust collector for particulate control and exhausting inside the building, capacity: 107,500 pounds of shot per hour, and 1,500 pounds of metal parts per hour.
- (f) One (1) paint booth, identified as EU-08, to be installed in 2006, equipped with one (1) airless HVLP spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 8A and 8B, capacity: 3,600 pounds of metal beams and parts per hour.

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

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

- (a) Six (6) natural gas-fired paint booth radiant heaters, identified as booth heaters, constructed in 1983, exhausting to the general ventilation system of the building, rated at 0.15 million British thermal units per hour, each.
- (b) Eight (8) natural gas-fired main shop radiant heaters, identified as shop heaters, four (4) constructed in 1983 and four (4) constructed in 1995, exhausting to the general ventilation system of the building, rated at 0.15 million British thermal units per hour, each.
- (c) Twenty-five (25) MIG welding stations, constructed in 1983, exhausting to the general ventilation system inside the building, capacity: 10.31 pounds of wire per hour, each.
- (d) One (1) TIG welding station, constructed in 1983, exhausting to the general ventilation system inside the building, capacity: 0.33 pounds of wire per hour.
- (e) Three (3) stick welding stations, constructed in 1983, exhausting to the general ventilation system inside the building, capacity: 0.08 pounds of wire per hour, each.
- (f) One (1) flame cutting plasma table, constructed in 2001, exhausting to the general ventilation system inside the building, with a maximum metal thickness cut of 5.0 inches, capacity: six (6) inches per minute.
- (g) Thirteen (13) oxyacetylene flame-cutting stations, constructed in 1986, exhausting to the general ventilation system inside the building, with a maximum metal thickness cut of 0.5 inches, capacity: 1.2 inches per minute, each.

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

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

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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

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

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

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

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

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

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

B.5 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, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

B.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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, 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, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the ~~A~~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, 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 Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967
 - (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

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

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

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

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

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

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

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

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

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does 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 non-compliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.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 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, Indiana 46204-2251

- (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, on or before the date it is due.

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

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

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

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

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

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

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

and

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

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

- (5) The Permittee maintains records on-site 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, 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 13-30-3-1] [IC 13-17-3-2]

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

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

B.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

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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 satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration);
- (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) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 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.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

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

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

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(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.6 Fugitive Dust Emissions [326 IAC 6-4]

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

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

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

C.8 Stack Height [326 IAC 1-7]

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

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by 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. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.10 Performance Testing [326 IAC 3-6]

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.12 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.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed 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.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

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

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

C.15 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on February 8, 1999.
- (b) Upon direct notification by IDEM, OAQ 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.16 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 source must comply with the applicable requirements of 40 CFR 68.

C.17 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 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 10 days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the 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 Anormal@ 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, in accordance with Section D, 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.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

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

The response action documents submitted pursuant to this condition do require the certification by 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.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source 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 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by 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.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) paint booth, identified as EU-01, constructed in 1999, equipped with one (1) airless spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 01 A and B, capacity: 3,600 pounds of metal beams and parts per hour.
- (b) One (1) paint booth, identified as EU-05, constructed in 1983, equipped with one (1) airless HVLP spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 03, 04 and 05, capacity: 3,600 pounds of metal beams and parts per hour.
- (c) One (1) paint booth, identified as EU-07, constructed in 2002, equipped with one (1) airless HVLP spray gun and a built-in dry filter system, exhausting to Stack S/V 07, capacity: 2,500 pounds of metal parts per hour.
- (f) One (1) paint booth, identified as EU-08, to be installed in 2006, equipped with one (1) airless HVLP spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 8A and 8B, capacity: 3,600 pounds of metal beams and parts per hour.

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

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

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

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5), as delivered to the applicator.

D.1.2 Volatile Organic Compounds (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the four (4) paint booths (EU-01, EU-05, EU-07, and EU-08) during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.3 PSD and FESOP Minor Limit [326 IAC 2-2] [326 IAC 2-8-4] [326 IAC 2-8-11.1(d)(4)]

- (a) Pursuant to FESOP 043-9832-00049, issued on August 6, 1998, and MPR 043-21949-00049 the use of VOC, including coatings, dilution solvents, and cleaning solvents, at the four (4) paint booths shall be limited to 95.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period, including less than 5.00 tons per year from insignificant activities. Compliance with this limit makes 326 IAC 2-7 (Part 70) not applicable.
- (b) The use of VOC, including coatings, dilution solvents, and cleaning solvents at the paint booth (EU-08) shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes MPR 043-21949-00049 a minor permit revision pursuant to 326 IAC 2-8-11.1(d)(4).
- (c) The solids delivered to the applicators at the four (4) paint booths (EU-01, EU-05, EU-07, and EU-08) shall not exceed 1,226 tons per consecutive twelve (12) month period, total, with compliance determined at the end of each month, based on a ten percent (10%)

transfer efficiency and a dry filter control efficiency of ninety-nine percent (99%). This usage limit, in conjunction with Conditions D.2.2 and D.3.2, is required to limit the potential to emit of PM₁₀ to less than 100 tons per twelve (12) consecutive month period, and to limit the potential to emit PM to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70) not applicable.

Compliance with this limit also makes MPR-043-21949-00049 a minor permit revision pursuant to 326 IAC 2-8-11.1(d)(4).

- (d) The use of each individual HAP, including HAPs from coatings, dilution solvents, and cleaning solvents, at the four (4) paint booths shall be limited to less than 9.98 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of each individual HAP to less than 10 tons per twelve (12) consecutive month period, including 0.017 tons per year from insignificant activities. Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70) not applicable.
- (e) The use of any combination of HAPs, including HAPs from coatings, dilution solvents, and cleaning solvents, at the four (4) paint booths shall be limited to less than 24.4 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of any combination of HAPs to less than 25 tons per twelve (12) consecutive month period, including 0.573 tons per year from insignificant activities. Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70) not applicable.

D.1.4 Particulate [326 IAC 6-3-2(d)]

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

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

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

Compliance Determination Requirements

D.1.6 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.1.1 and D.1.3 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 Δ as supplied $\text{\textcircled{a}}$ and Δ as applied $\text{\textcircled{a}}$ VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the HAPs usage limitations contained in Condition D.1.3 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 Δ as supplied $\text{\textcircled{a}}$ and Δ as applied $\text{\textcircled{a}}$ HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks (Stacks S/V 01 A and B, S/V 03, 04 and 05, S/V 07, and S/V 8A and 8B) while one or more of the booths exhausting to that stack are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. 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.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.3(a) and (b), 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 usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.3(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.3(b), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the solids usage limit established in Condition D.1.3(b). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The solids content of each coating material and solvent used.
 - (2) The amount of coating material used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total solids usage for each month; and
 - (4) The weight of solids (PM and PM₁₀) emitted for each compliance period.
- (c) To document compliance with Condition D.1.3(c) and (d), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.3(c) and (d). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The individual and total HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The individual and total HAP usage for each month; and
 - (4) The weight of each individual HAP and total HAPs emitted for each compliance period.
- (d) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (e) To document compliance with Condition D.1.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (d) One (1) sand abrasive booth, identified as EU-02, constructed in 1986, equipped with a cartridge dust collector for particulate control and exhausting to Stack S/V 02, capacity: 625 pounds of sand per hour and 16,914 pounds of metal parts per hour.

(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 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) sand abrasive booth (EU-02) shall not exceed 17.6 pounds per hour when operating at a process weight rate of 8.77 tons per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.2.2 PSD and FESOP Minor Limits [326 IAC 2-2] [326 IAC 2-8-4]

- (a) Pursuant to FESOP 043-9832-00049, issued on August 6, 1998, the PM from the sand abrasive booth (EU-02) shall be limited to 1.88 pounds per hour, which is equivalent to less than 8.24 tons per year. Therefore, the requirements of 326 IAC 2-2, PSD, will not apply. This will also satisfy the requirements of 326 IAC 6-3-2, in Condition D.2.1.
- (b) Pursuant to FESOP 043-9832-00049, issued on August 6, 1998, the PM₁₀ emissions from the sand abrasive booth (EU-02) shall be limited to 3.42 pounds per hour, equivalent to 15.0 tons per year. Therefore, the requirements of 326 IAC 2-2, PSD, and 326 IAC 2-7, Part 70, will not apply.

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

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

Compliance Determination Requirements

D.2.4 Particulate Control

In order to comply with Condition D.2.2, the cartridge dust collector for particulate control shall be in operation and control emissions from the sand abrasive booth at all times that the sand abrasive booth is in operation.

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

D.2.5 Visible Emissions Notations

- (a) Visible emission notations of the sand abrasive booth (EU-02) stack (S/V 02) exhaust shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.6 Dust Collector Inspections

An inspection shall be performed each calendar quarter of the dust collector controlling the sand abrasive booth. Inspections required by this condition shall not be performed in consecutive months. All defective cartridges shall be replaced.

D.2.7 Broken or Failed Dust Collector Detection

In the event that dust collector failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after a failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For single compartment units, if failure is indicated by a significant drop in the dust collector=s pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the sand abrasive booth (EU-02) stack (S/V 02) exhaust once per shift.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections required under Condition D.2.6.
- (c) To document compliance with Condition D.2.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (e) One (1) mechanical blast unit, identified as EU-03, constructed in 1999, equipped with a dust collector for particulate control and exhausting inside the building, capacity: 107,500 pounds of shot per hour, and 1,500 pounds of metal parts per hour.

(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 [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the one (1) mechanical blast booth (EU-03) shall not exceed 45.4 pounds per hour when operating at a process weight rate of 54.5 tons per hour.

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.3.2 PSD and FESOP Minor Limits [326 IAC 2-2] [326 IAC 2-8-4]

- (a) Pursuant to FESOP 043-9832-00049, issued on August 6, 1998, the PM from the mechanical blast booth (EU-03) shall be limited to 45.25 pounds per hour, which is equivalent to 198 tons per year. Therefore, the requirements of 326 IAC 2-2, PSD, will not apply. This will also satisfy the requirements of 326 IAC 6-3-2, in Condition D.3.1.
- (b) Pursuant to FESOP 043-9832-00049, issued on August 6, 1998, the PM₁₀ emissions from the mechanical blast booth (EU-03) shall be limited to 15.29 pounds per hour, equivalent to 67.0 tons per year. Therefore, the requirements of 326 IAC 2-2, PSD, and 326 IAC 2-7, Part 70, will not apply.

D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.3.4 Particulate Control

Pursuant to FESOP 043-9832-00049, issued on August 6, 1998, and in order to comply with Conditions D.3.1 and D.3.2, the dust collector for particulate control shall be in operation and control emissions from the mechanical blast booth at all times that the mechanical blast booth is in operation.

D.3.5 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 this FESOP, in order to demonstrate compliance with Conditions D.3.1 and D.3.2, the Permittee shall perform PM and PM₁₀ testing for the mechanical blast booth (EU-03) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.3.6 Visible Emissions Notations

- (a) Visible emission notations of the mechanical blast booth (EU-03) stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.3.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the dust collector used in conjunction with the mechanical blast booth, at least once per shift when the mechanical blast booth is in operation when venting to the atmosphere. When or any one reading, the pressure drop across the dust collector is outside the normal range of 2.0 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

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

D.3.8 Dust Collector Inspections

An inspection shall be performed each calendar quarter of the dust collector controlling the mechanical blast booth when venting to the atmosphere. A dust collector inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective cartridges shall be replaced.

D.3.9 Broken or Failed Dust Collector Detection

In the event that dust collector failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response

steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after a failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

- (b) For single compartment units, if failure is indicated by a significant drop in the dust collector=s pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.3.10 Record Keeping Requirements

- (a) To document compliance with Condition D.3.6, the Permittee shall maintain records of visible emission notations of the mechanical blast booth (EU-03) stack exhaust once per shift when exhausting to the atmosphere.
- (b) To document compliance with Condition D.3.7, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.3.3 the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) To document compliance with Condition D.3.8, the Permittee shall maintain records of the results of the inspections required under Condition D.3.8 and the dates the vents are redirected.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

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

- (a) Six (6) natural gas-fired paint booth radiant heaters, identified as booth heaters, constructed in 1983, exhausting to the general ventilation system of the building, rated at 0.15 million British thermal units per hour, each.
- (b) Eight (8) natural gas-fired main shop radiant heaters, identified as shop heaters, four (4) constructed in 1983 and four (4) constructed in 1995, exhausting to the general ventilation system of the building, rated at 0.15 million British thermal units per hour, each.
- (c) Twenty-five (25) MIG welding stations, constructed in 1983, exhausting to the general ventilation system inside the building, capacity: 10.31 pounds of wire per hour, each.
- (d) One (1) TIG welding station, constructed in 1983, exhausting to the general ventilation system inside the building, capacity: 0.33 pounds of wire per hour.
- (e) Three (3) stick welding stations, constructed in 1983, exhausting to the general ventilation system inside the building, capacity: 0.08 pounds of wire per hour, each.
- (f) One (1) flame cutting plasma table, constructed in 2001, exhausting to the general ventilation system inside the building, with a maximum metal thickness cut of 5.0 inches, capacity: six (6) inches per minute.
- (g) Thirteen (13) oxyacetylene flame-cutting stations, constructed in 1986, exhausting to the general ventilation system inside the building, with a maximum metal thickness cut of 0.5 inches, capacity: 1.2 inches per minute, each.

(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.4.1 Particulate [326 IAC 6-3-2]

- (a) Any change or modification to the welding operations at this source that result in the welding operations consuming six hundred twenty-five (625) pounds of rod or wire per day or more shall cause the welding operations to become subject to 326 IAC 6-3-2, and shall require prior IDEM, OAQ, approval.
- (b) Any change or modification at the oxyacetylene flame-cutting stations at this source that results in cutting three thousand four hundred (3,400) inches per hour of stock or more shall cause the oxyacetylene flame-cutting stations to become subject to 326 IAC 6-3-2, and shall require prior IDEM, OAQ, approval.
- (c) Any change or modification at the flame cutting plasma table at this source that results in cutting three thousand four hundred (3,400) inches per hour of stock or more shall cause the flame cutting plasma table to become subject to 326 IAC 6-3-2, and shall require prior IDEM, OAQ, approval.

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

D.4.2 Record Keeping Requirements

To document compliance with Condition D.4.1(a), the Permittee shall maintain monthly records of the weld wire and rod usage.

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

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

Source Name: Padgett, Inc.
Source Address: 901 E. Fourth Street, New Albany, Indiana 47150
Mailing Address: P.O. Box 1375, New Albany, Indiana 47151
FESOP No.: 043-16746-00049

**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:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 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:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-5674
Fax: 317-233-5967**

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

Source Name: Padgett, Inc.
Source Address: 901 E. Fourth Street, New Albany, Indiana 47150
Mailing Address: P.O. Box 1375, New Albany, Indiana 47151
FESOP No.: 043-16746-00049

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Padgett, Inc.
Source Address: 901 E. Fourth Street, New Albany, Indiana 47150
Mailing Address: P.O. Box 1375, New Albany, Indiana 47151
FESOP No.: 043-16746-00049
Facilities: One (1) paint booth (EU-08)
Parameter: VOC usage
Limit: Less than twenty five (25) tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Padgett, Inc.
Source Address: 901 E. Fourth Street, New Albany, Indiana 47150
Mailing Address: P.O. Box 1375, New Albany, Indiana 47151
FESOP No.: 043-16746-00049
Facilities: Four (4) paint booths (EU-01, EU-05, EU-07, and EU-08)
Parameter: VOC usage
Limit: 95.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Padgett, Inc.
Source Address: 901 E. Fourth Street, New Albany, Indiana 47150
Mailing Address: P.O. Box 1375, New Albany, Indiana 47151
FESOP No.: 043-16746-00049
Facilities: Four (4) paint booths (EU-01, EU-05, EU-07, and EU-08)
Parameter: Solids usage
Limit: 1,226 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month, equivalent to 11.0 tons per year of PM and PM₁₀ emitted

YEAR: _____

Month	Solids Usage (tons)	Solids Usage (tons)	Solids Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Padgett, Inc.
Source Address: 901 E. Fourth Street, New Albany, Indiana 47150
Mailing Address: P.O. Box 1375, New Albany, Indiana 47151
FESOP No.: 043-16746-00049
Facilities: Four (4) paint booths (EU-01, EU-05, EU-07, and EU-08)
Parameter: Individual HAP usage
Limit: Less than 9.98 per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: _____

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Padgett, Inc.
Source Address: 901 E. Fourth Street, New Albany, Indiana 47150
Mailing Address: P.O. Box 1375, New Albany, Indiana 47151
FESOP No.: 043-16746-00049
Facilities: Four (4) paint booths (EU-01, EU-05, EU-07, and EU-08)
Parameter: Total HAP usage
Limit: 24.4 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: _____

Month	Total HAP Usage (tons)	Total HAP Usage (tons)	Total HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Padgett, Inc.
Source Address: 901 E. Fourth Street, New Albany, Indiana 47150
Mailing Address: P.O. Box 1375, New Albany, Indiana 47151
FESOP No.: 043-16746-00049

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do 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@ .	
9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
9 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:	

9 No deviation occurred in this quarter.

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Padgett, Inc.
Source Location:	901 E. Fourth Street, New Albany, Indiana 47150
County:	Floyd
SIC Code:	3441
Operation Permit No.:	F 043-16746-00049
Operation Permit Issuance Date:	May 20, 2004
Minor Permit Revision No.:	MPR 043-21949-00049
Permit Reviewer:	Brian J. Pedersen

The Office of Air Quality (OAQ) has reviewed a minor permit revision application from Padgett, Inc. relating to the construction and operation of the following emission unit and pollution control devices:

One (1) paint booth, identified as EU-08, to be installed in 2006, equipped with one (1) airless HVLP spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 8A and 8B, capacity: 3,600 pounds of metal beams and parts per hour.

History

On October 21, 2005 Padgett, Inc. submitted an application to the OAQ requesting to add one (1) paint booth, identified as EU-08, to their existing plant. The paint booth shall be controlled by dry filters. Padgett, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Renewal on May 20, 2004.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
8A	Surface Coating	30	4.00	30,000	Ambient
8B	Surface Coating	30	4.00	30,000	Ambient

Recommendation

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

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

An application for the purposes of this review was received on October 21, 2005. Additional information was received on November 22, 2005 and November 29, 2005.

Emission Calculations

See pages 1 and 2 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Revision

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.

This table reflects the PTE before controls for this revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	202
PM ₁₀	202
SO ₂	-
VOC	105
CO	-
NO _x	-

HAPs	Potential To Emit (tons/year)
Xylene	33.0
Ethylbenzene	4.83
Toluene	0.254
MIBK	11.3
TOTAL	33.0

Justification for Revision

The FESOP is being revised through a FESOP Minor Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(d)(4) because the potential to emit of PM/PM₁₀ will be limited to under twenty five (25) tons per year, and VOC shall be limited to under twenty five (25) tons per year.

County Attainment Status

The source is located in Floyd County.

Pollutant	Status
PM _{2.5}	Nonattainment
PM ₁₀	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-Hour Ozone	Nonattainment
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. Floyd County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements of 326 IAC 2-3, Emission Offset. See the State Rule Applicability - Entire Source section of this document.
- (b) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Floyd County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions pursuant to the Nonattainment New Source Review requirements. See the State Rule Applicability for the source section.
- (c) Floyd County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.
- (d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (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.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	224.0
PM ₁₀	Less than 100
SO ₂	0.006
VOC	Less than 100
CO	0.773
NO _x	0.920

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of two-hundred fifty (250) tons per year or more, and it is not one of the twenty-eight (28) listed source categories.
- (b) These emissions are based upon the TSD for F 043-16746-00049.

Potential to Emit of Revision After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this FESOP revision.

Process/facility	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
One (1) paint booth (EU-08)	11.0	11.0	-	Less than 25.0	-	-	Less than 9.98 individual and 24.4 combination
PSD or Emission Offset Threshold Level	250	250	250	100	250	100	-

The use of VOC, including coatings, dilution solvents, and cleaning solvents at the paint booth (EU-08) shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes MPR 043-21949-00049 a minor permit revision pursuant to 326 IAC 2-8-11.1(d)(4).

This revision to an existing minor stationary source is not major because the emission increase is less than the PSD and Emission Offset threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed revision.
- (b) The potential to emit each individual HAP is limited to less than ten (10) tons per year, and the potential to emit any combination of HAPs is limited to less than twenty-five (25) tons per year in order to comply with 326 IAC 2-8-4, FESOP (see 326 IAC 2-8-4 (FESOP), below). Therefore, this source is not a major source of HAPs, and the requirements of 40 CFR 63, Subpart M, for Miscellaneous Metal Parts and Products Surface Coating, are not included in this permit for this revision.
- (c) There are no other National Emission Standards for Hazardous Air Pollutants included in the permit for this revision.

State Rule Applicability - Individual Facilities

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

The one (1) paint booth, identified as EU-08, shall be incorporated into the preexisting PM/PM₁₀ and VOC limits that were used for paint booths EU-01, EU-05, and EU-07. The potential to emit of PM and VOC from the one (1) paint booth, identified as EU-08, which was constructed after August 7, 1977, is limited to less than two hundred fifty (250) tons per year. Therefore, the requirements of 326 IAC 2-2 are not applicable for PM and VOC. Specific limitations are as follows:

- (a) Since PM emissions from the four (4) paint booths (EU-01, EU-05, EU-07, and EU-08) are equal to PM₁₀ emissions from those facilities, the solids usage limitation required to comply with 326 IAC 2-8-4, FESOP (see 326 IAC 2-8-4 (FESOP), below) will also limit the potential to emit of PM to 11.0 tons per year and make this source a minor source pursuant to 326 IAC 2-2, PSD.

As a result of these limitations, the potential to emit PM from the total of all significant emission units is limited to 217 tons per year. Since the unrestricted potential to emit PM from the total of all insignificant activities is less than 7.00 tons per year, the potential to emit PM₁₀ from the entire source is limited to less than 224 tons per year, which is less than two hundred fifty (250) tons per year.

- (b) The potential to emit PM₁₀ is limited to less than one hundred (100) tons per year to comply with 326 IAC 2-8-4, FESOP (see 326 IAC 2-8-4 (FESOP), below). Compliance with that limit will also ensure that this source is a minor source of PM₁₀ pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.
- (c) The use of VOC, including coatings, dilution solvents, and cleaning solvents, at the four (4) paint booths shall be limited to 95.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month in order to comply with 326 IAC 2-8-4 (FESOP). Compliance with that limit will also ensure that this source is a minor source of VOC pursuant to 326 IAC 2-2, Prevention of Significant Deterioration.

326 IAC 2-8-4 (FESOP)

The one (1) paint booth, identified as EU-08, shall be incorporated into the preexisting PM/PM₁₀ and VOC limits that were used for paint booths EU-01, EU-05, and EU-07. Pursuant to this rule, the amount of PM₁₀ and VOC shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of

all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply. Specific limitations are as follows:

(a) The use of VOC, including coatings, dilution solvents, and cleaning solvents, at the four (4) paint booths (EU-01, EU-05, EU-07 and EU-08) shall be limited to 95.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. The unrestricted potential VOC emissions from the total of all insignificant activities is less than five (5.00) tons per year. Therefore, this will limit the total source potential to emit VOC to less than one hundred (100) tons per year.

(b) The potential to emit PM₁₀ is limited to less than one hundred (100) tons per year as follows:

The solids delivered to the applicators at the four (4) paint booths (EU-01, EU-05, EU-07 and EU-08) shall not exceed 1,226 tons per consecutive twelve (12) month period, total, with compliance determined at the end of each month, based on a ten percent (10%) transfer efficiency and a dry filter control efficiency of ninety-nine percent (99%). This is equivalent to PM₁₀ emissions of 11.0 tons per year from the total of the four (4) paint booths, when operating the dry filters at all times when the four (4) paint booths are in operation.

As a result of these limitations, the potential to emit PM₁₀ from the total of all significant emission units is limited to 93.0 tons per year. Since the unrestricted potential to emit PM₁₀ from the total of all insignificant activities is less than 7.00 tons per year, the potential to emit PM₁₀ from the entire source is limited to less than one hundred (100) tons per year.

(c) The use of each individual HAP, including HAPs from coatings, dilution solvents, and cleaning solvents, at the four (4) paint booths shall be limited to less than 9.98 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month, and the use of any combination of HAPs, including HAPs from coatings, dilution solvents, and cleaning solvents, at the four (4) paint booths shall be limited to less than 24.4 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. The unrestricted potential individual organic HAP emissions from the total of all insignificant activities is 0.017 tons per year, and the total HAP emissions from the total of all insignificant activities is 0.573 tons per year. Therefore, this will limit the total source potential to emit each individual HAP to less than ten (10) tons per year, and the potential to emit total HAPs to less than twenty five (25) tons per year.

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

The one (1) paint booth, identified as EU-08, constructed after July 1, 1990 (to be constructed in 2006), will have actual VOC emissions of fifteen (15) pounds per day or more. Therefore, the one (1) paint booth, identified as EU-08, is subject to the requirements of 326 IAC 8-2-9, Miscellaneous Metal Coating. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

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

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

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

Pursuant to 326 IAC 6-3-2(d), the dry filters for particulate control shall be operation in accordance with manufacturer's specifications and control emissions from the one (1) spray booth, identified as EU-08, at all times when the one (1) spray booth, identified as EU-08, is in operation.

Compliance Requirements

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

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

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

The one (1) paint booth, identified as EU-08, has applicable compliance monitoring conditions as specified below:

Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation. Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for these units shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the filters for the surface coating booth must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate emission limitations, work practices and control technologies), 326 IAC 5-1 (Opacity Limitations), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-8 (FESOP).

Testing Requirements

There are no testing requirements being proposed for this modification.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

Change 1:

The letterhead of the permit has been revised to indicate the new Governor and the new Commissioner of IDEM. The P.O. Box in the address of the OAQ has been deleted throughout the permit and the ZIP code has been revised as follows:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, ~~P.O. Box 6015~~
Indianapolis, Indiana 46204 ~~6-6015~~

Change 2:

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, the Condition B.23 reflecting this rule will be incorporated into the permit as follows:

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

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

Change 3:

The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 has been revised to remove (a) which contained these requirements, and Condition D.1.4 which contained these requirements has been removed and all subsequent conditions have been renumbered. Since the requirements of the 326 IAC 6-3-2(d) that were effective June 12, 2002 are now federally enforceable, the last statement from Condition C.1 has been removed..

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

~~(a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.~~

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

~~D.1.4 Particulate Matter (PM) [40 CFR 52, Subpart P]~~

~~Pursuant to FESOP 043-9832-00049, issued on August 6, 1998 and 40 CFR 52 Subpart P, the PM from the three (3) paint booths (EU-01, EU-5 and EU-07) shall not exceed the pound per hour emission rate established as E in the following formula:~~

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

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

D.1.45 Particulate [326 IAC 6-3-2(d)]

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

D.1.56 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

D.1.67 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.1.1 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the ~~As supplied~~ and ~~As applied~~ VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.78 Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the HAPs usage limitations contained in Condition D.1.3 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, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.89 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stacks (Stacks S/V 01 A and B, S/V 03, 04 and 05, ~~and S/V 07, and S/V 8A and 8B~~) while one or more of the booths exhausting to that stack are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. 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.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.940 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.3(a) **and (b)**, 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 usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.3(a). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.3(b), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the solids usage limit established in Condition D.1.3(b). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The solids content of each coating material and solvent used.
 - (2) The amount of coating material used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (3) The total solids usage for each month; and
 - (4) The weight of solids (PM and PM₁₀) emitted for each compliance period.
- (c) To document compliance with Condition D.1.3(c) and (d), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.3(c) and (d). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The individual and total HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The individual and total HAP usage for each month; and
- (4) The weight of each individual HAP and total HAPs emitted for each compliance period.
- (d) To document compliance with Condition D.1.89, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (e) To document compliance with Condition D.1.56, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.1044 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

Change 4:

The source is proposing to add a new paint booth, identified as EU-08. This new emission unit has been added to Condition A.2 and the Facility Description in Section D.1. This paint booth, identified as EU-08, shall be incorporated into the existing VOC and PM/PM₁₀ limits. The addition of paint booth EU-08 has been incorporated into Conditions D.1.2, D.1.3, and the Quarterly Reports as follows:

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) paint booth, identified as EU-01, constructed in 1999, equipped with one (1) airless spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 01 A and B, capacity: 3,600 pounds of metal beams and parts per hour.
- (b) One (1) paint booth, identified as EU-05, constructed in 1983, equipped with one (1) airless HVLP spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 03, 04 and 05, capacity: 3,600 pounds of metal beams and parts per hour.
- (c) One (1) paint booth, identified as EU-07, constructed in 2002, equipped with one (1) airless HVLP spray gun and a built-in dry filter system, exhausting to Stack S/V 07, capacity: 2,500 pounds of metal parts per hour.
- (d) One (1) sand abrasive booth, identified as EU-02, constructed in 1986, equipped with a cartridge dust collector for particulate control and exhausting to Stack S/V 02, capacity: 625 pounds of sand per hour and 16,914 pounds of metal parts per hour.
- (e) One (1) mechanical blast unit, identified as EU-03, constructed in 1999, equipped with a dust collector for particulate control and exhausting inside the building, capacity: 107,500 pounds of shot per hour, and 1,500 pounds of metal parts per hour.

- (f) **One (1) paint booth, identified as EU-08, to be installed in 2006, equipped with one (1) airless HVLP spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 8A and 8B, capacity: 3,600 pounds of metal beams and parts per hour.**

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) paint booth, identified as EU-01, constructed in 1999, equipped with one (1) airless spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 01 A and B, capacity: 3,600 pounds of metal beams and parts per hour.
- (b) One (1) paint booth, identified as EU-05, constructed in 1983, equipped with one (1) airless HVLP spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 03, 04 and 05, capacity: 3,600 pounds of metal beams and parts per hour.
- (c) One (1) paint booth, identified as EU-07, constructed in 2002, equipped with one (1) airless HVLP spray gun and a built-in dry filter system, exhausting to Stack S/V 07, capacity: 2,500 pounds of metal parts per hour.
- (f) **One (1) paint booth, identified as EU-08, to be installed in 2006, equipped with one (1) airless HVLP spray gun and dry filters to control particulate overspray, exhausting to Stacks S/V 8A and 8B, capacity: 3,600 pounds of metal beams and parts per hour.**

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

D.1.2 Volatile Organic Compounds (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the ~~three (3)~~ **four (4)** paint booths (EU-01, EU-05, ~~and EU-07, and EU-08~~) during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.3 PSD and FESOP Minor Limit [326 IAC 2-2] [326 IAC 2-8-4] **[326 2-8-11.1(d)(4)]**

- (a) Pursuant to FESOP 043-9832-00049, issued on August 6, 1998, **and MPR 043-21949-00049** the use of VOC, including coatings, dilution solvents, and cleaning solvents, at the ~~three (3)~~ **four (4)** paint booths shall be limited to 95.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period, including less than 5.00 tons per year from insignificant activities. Compliance with this limit makes 326 IAC 2-7 (Part 70) not applicable.
- (b) **The use of VOC, including coatings, dilution solvents, and cleaning solvents at the paint booth (EU-08) shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes MPR 043-21949-00049 a minor permit revision pursuant to 326 IAC 2-8-11.1(d)(4).**
- (c)~~(b)~~ The solids delivered to the applicators at the ~~three (3)~~ **four (4)** paint booths (EU-01, EU-05 ~~and~~, EU-07, **and EU-08**) shall not exceed 1,226 tons per consecutive twelve (12) month period, total, with compliance determined at the end of each month, based on a ten percent (10%) transfer efficiency and a dry filter control efficiency of ninety-nine percent (99%). This

usage limit, in conjunction with Conditions D.2.2 and D.3.2, is required to limit the potential to emit of PM₁₀ to less than 100 tons per twelve (12) consecutive month period, and to limit the potential to emit PM to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70) not applicable.

Compliance with this limit also makes MPR-043-21949-00049 a minor permit revision pursuant to 326 IAC 2-8-11.1(d)(4).

- (d)(e) The use of each individual HAP, including HAPs from coatings, dilution solvents, and cleaning solvents, at the ~~three (3)~~ **four (4)** paint booths shall be limited to less than 9.98 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of each individual HAP to less than 10 tons per twelve (12) consecutive month period, including 0.017 tons per year from insignificant activities. Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70) not applicable.
- (e)(d) The use of any combination of HAPs, including HAPs from coatings, dilution solvents, and cleaning solvents, at the ~~three (3)~~ **four (4)** paint booths shall be limited to less than 24.4 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of any combination of HAPs to less than 25 tons per twelve (12) consecutive month period, including 0.573 tons per year from insignificant activities. Compliance with these limits makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-7 (Part 70) not applicable.

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

FESOP Quarterly Report

Source Name: Padgett, Inc.
Source Address: 901 E. Fourth Street, New Albany, Indiana 47150
Mailing Address: P.O. Box 1375, New Albany, Indiana 47151
FESOP No.: 043-16746-00049
Facilities: One (1) paint booth (EU-08)
Parameter: VOC usage
Limit: Less than twenty five (25) tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Padgett, Inc.
 Source Address: 901 E. Fourth Street, New Albany, Indiana 47150
 Mailing Address: P.O. Box 1375, New Albany, Indiana 47151
 FESOP No.: 043-16746-00049
 Facilities: ~~Three (3)~~ **Four (4)** paint booths (EU-01, EU-05, ~~and EU-07,~~ **and EU-08**)
 Parameter: VOC usage
 Limit: 95.0 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Padgett, Inc.
 Source Address: 901 E. Fourth Street, New Albany, Indiana 47150
 Mailing Address: P.O. Box 1375, New Albany, Indiana 47151
 FESOP No.: 043-16746-00049
 Facilities: ~~Three (3)~~ **Four (4)** paint booths (EU-01, EU-05, ~~and EU-07,~~ **and EU-08**)
 Parameter: Solids usage
 Limit: 1,226 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month, equivalent to 11.0 tons per year of PM and PM₁₀ emitted

YEAR: _____

Month	Solids Usage (tons)	Solids Usage (tons)	Solids Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Padgett, Inc.
 Source Address: 901 E. Fourth Street, New Albany, Indiana 47150
 Mailing Address: P.O. Box 1375, New Albany, Indiana 47151
 FESOP No.: 043-16746-00049
 Facilities: ~~Three (3)~~ **Four (4)** paint booths (EU-01, EU-05, ~~and EU-07,~~ **and EU-08**)
 Parameter: Individual HAP usage
 Limit: Less than 9.98 per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: _____

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Padgett, Inc.
 Source Address: 901 E. Fourth Street, New Albany, Indiana 47150
 Mailing Address: P.O. Box 1375, New Albany, Indiana 47151
 FESOP No.: 043-16746-00049
 Facilities: ~~Three (3)~~ **Four (4)** paint booths (EU-01, EU-05, and EU-07, and EU-08)
 Parameter: Total HAP usage
 Limit: 24.4 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month

YEAR: _____

Month	Total HAP Usage (tons)	Total HAP Usage (tons)	Total HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this quarter.
- 9 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.

Conclusion

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Minor Permit Revision No. 043-21949-00049.

**Appendix A: Federal Potential Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Padgett, Inc.
Address City IN Zip: 901 E. Fourth Street, New Albany, Indiana 47150
Permit Number: 043-21949
Plt ID: 043-00049
Reviewer: Brian J. Pedersen
Application Date: October 21, 2005

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Material (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	Particulate Potential (tons/yr)	VOC solids (lbs/gal)	Transfer Efficiency	Material Substrate
EU-08																		
Amerlock 2 Cure	11.76	12.80%	0.0%	12.80%	0.0%	74.7%	0.40	4.00	1.0	1.51	1.51	2.41	58	10.6	64.7	2.02	10%	Metal
Amerlock 2 Custom Color Resin	12.30	11.00%	0.0%	11.00%	0.0%	91.4%	0.40	4.00	1.0	1.35	1.35	2.16	52.0	9.5	69.0	1.48	10%	Metal
65T 00032	7.25	100.00%	0.0%	100.00%	0.0%	0.0%	0.20	4.00	1.0	7.25	7.25	5.80	139	25.4	0.0	n/a	10%	Metal
R-T-S	11.07	23.42%	0.00%	23.42%	0.0%	66.4%	1.00	4.00	1.0	2.59	2.59	10.4	249	45.4	133.7	3.90	10%	Metal
9510 Fab Prime	10.75	32.00%	0.00%	32.00%	0.0%	47.5%	1.00	7.00	1.0	3.44	3.44	24.1	578	105.5	201.7	7.24	10%	Metal
Warm Gray 3C	11.3	30.60%	0.00%	30.60%	0.0%	69.10%	0.17000	10.0	1.0	3.47	3.47	5.9	141	25.8	52.7	5.02	10%	Metal
State Potential Emissions											TOTALS:							
												24.1	577.9	105.5	201.7			
											Control Efficiency:	0.0%	0.0%	0.0%	99.0%			
											Potential after Control:	24.1	578	105	2.02			

State Potential Emissions Add worst case coating to all solvents

METHODOLOGY

RTS Density (lbs/gal) = ((Da*Va)+(Db*Vb)+(Dc*Vc))/(Va+Vb+Vc)

RTS Weight % H2O + Organics = ((Wa*Da*Va)+(Wb*Db*Vb)+(Wc*Dc*Vc))/((Da*Va)+(Db*Vb)+(Dc*Vc))

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Flash-off

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs) * Flash-off

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

Pounds VOC per Gallon of Solids = (Density (lb/gal) * Weight % organics) / (Volume % solids) * Flash-off

Total = RTS

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

**Company Name: Padgett, Inc.
Address City IN Zip: 901 E. Fourth Street, New Albany, Indiana 47150
Permit Number: 043-21949
Plt ID: 043-00049
Permit Reviewer: Brian J. Pedersen
Application Date: October 21, 2005**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethylbenzene	Weight % Toluene	Weight % MIBK	Xylene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Total HAP Emissions (ton/yr)
EU-08												
Ameron Epoxy												
Amerlock 2 Cure	11.8	0.400	4.00	11.5%	2.70%	0.00%	0.00%	9.48	2.23	0.00	0.00	11.7
Amerlock 2 Custom Color Resin	12.3	0.400	4.00	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
65T 00032	7.25	0.200	4.00	80.0%	19.0%	1.00%	0.00%	20.3	4.83	0.254	0.00	25.4
Primer												
9510 Fab Prime	10.75	1.00	7.00	10.0%	0.00%	0.00%	0.00%	33.0	0.00	0.00	0.00	33.0
Warm Gray 3C	11.3	0.170	10.0	1.31%	0.00%	0.00%	13.4%	1.10	0.00	0.00	11.3	12.4

Total State Potential Emissions

Totals: 33.0 4.83 0.254 11.3 33.0

METHODOLOGY

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