



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: April 18, 2006
RE: Indian Industries / 163-22258-00008
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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

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

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
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100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
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Mr. DeWayne Zint
Indian Industries, Inc., DBA Escalade Sports
P.O. Box 889
Evansville, IN 47706

April 18, 2006

Re: 163-22258-00008
Second Significant Permit Modification to
Part 70 Permit No.: 163-17594-00008

Dear Mr. Zint:

Indian Industries, Inc., DBA Escalade Sports was issued a Part 70 permit on February 2, 2005, for the operation of a sporting and athletic goods production plant. An application to modify the permit was received by the Office of Air Quality (OAQ) on December 5, 2005. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification includes:

- (a) Adding enforceable permit conditions to their Part 70 permit limiting the source-wide HAP emissions below major thresholds, and the deleting of all conditions in Sections D.1 and D.3 relating to 40 CFR 63, Subparts PPPP and WWWW applicability, respectively.
- (b) Removing the gun cleaner in Sections A.2 (e)(4) and D.1 (c)(3) of the Part 70 permit, and the corresponding Condition D.1.4.

All other conditions of the permit shall remain unchanged and in effect



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 Alic Bent, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or at 973-575-2555, extension 3206, or dial 1-800-451-6027, and ask for extension 3-6878.

Sincerely,

Original Signed By:
Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments
AB / EVP

cc: File - Vanderburgh County
U.S. EPA, Region V
Evansville EPA
Vanderburgh County Health Department
Air Compliance Section Inspector – Derrick Ohning
Compliance Data Section
Administrative and Development
Technical Support and Modeling



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**PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY**

**Indian Industries, Inc., DBA Escalade Sports
817 Maxwell Avenue
Evansville, Indiana 47711**

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

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

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

Operation Permit No.: T163-17594-00008	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: February 2, 2005 Expiration Date: February 2, 2010
1st Minor Source Modification 163-20506-00008	Issuance Date: February 22, 2005
1st Significant Permit Modification 163-20069-00008	Issuance Date: May 16, 2005
1st Review Request 163-21149-00008	Issuance Date: July 12, 2005
1st Administrative Amendment: 163-21401-00008	Issuance Date: July 28, 2005
2nd Minor Source Modification 163-21866-00008	Issuance Date: November 15, 2005
1st Minor Permit Modification 163-21902-00008	Issuance Date: January 18, 2006
2nd Significant Permit Modification No.:163-22258-00008	Pages Affected: Entire Permit
Issued by: Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: April 18, 2006 Expiration Date: February 2, 2010

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a sporting and athletic goods production source.

Responsible Official:	Jim Allshouse - President
Source Address:	817 Maxwell Avenue, Evansville, IN 47711
Mailing Address:	P.O Box 889, Evansville, IN 47706
General Source Phone Number:	812-467-1264
SIC Code:	3949
County Location:	Vanderburgh
Source Location Status:	Nonattainment for PM2.5 Basic Nonattainment for Ozone under the 8-hour Standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Major Source, under Emission Offset Major Source, Section 112 of the Clean Air Act

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

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

- (a) The following surface coating operations at the Table Tennis production line identified as unit #T1:
- (1) One (1) front spray booth, identified as T0178 and constructed in 1968, with a maximum capacity of coating 180 wooden table tennis boards per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: T0178s);
 - (2) One (1) UV Fill machine, identified as T0150 and constructed in 1972, with a maximum capacity of 180 wooden table tennis boards per hour, and exhausting through one (1) stack (S/V ID: T0150s);
 - (3) one (1) undercoater and electric oven, identified as T0153 and constructed in 1975, with a maximum capacity of coating 180 wooden table tennis boards per hour, utilizing roller application, and exhausting through two (2) stacks (S/V ID: T0153As, T0153Bs), respectively;
 - (4) one (1) precision coater, identified as T0154 and constructed in 1992, with a maximum capacity of coating 180 wooden table tennis boards per hour, utilizing roller application, and exhausted through one (1) stack (S/V ID: T0154s);

- (5) one (1) back spray booth, identified as T0362 and constructed in 1990, with a maximum capacity of coating 72 wooden table tennis boards per hour, utilizing HVLP application with dry filters for overspray control and exhausted through one (1) stack (S/V ID: T0362s).
 - (6) one (1) undercoater with an electric oven, identified as T0156 and constructed in 2000, with a maximum capacity of coating 138 wooden table tennis boards per hour, utilizing roller application, and exhausting through one (1) stack (S/V ID: T0156s).
 - (7) One (1) table tennis board silk screen machine, identified as T0396 and constructed in 2000, capable of painting 140 units per hour.
 - (8) One (1) UV drying oven, identified as T0398 and constructed in 2000, rated at 50 KW.
 - (9) One (1) clean-up area, identified as T0399 and constructed in 2000, with a maximum usage rate of 0.28 gallon of solvent per hour.
- (b) The following surface coating operations at the Archery Spray Booth production line identified as Unit# ASB:
- (1) one (1) surface coating booth, identified as AO311 and constructed in 1968, with a maximum capacity of coating 135 fiberglass bow limbs per hour, utilizing HVLP application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: AO311s).
- (c) One (1) archery fiberglass string roving bow molding operation, identified as Unit# ABM and constructed in 1967, with a maximum capacity of producing 99 bows per hour, consisting of four (4) resin mix tanks exhausting through one (1) stack (S/V ID: A0053s), four (4) wrapping stations, and four (4) heated bow mold presses, each exhausting inside the plant;
- (d) The following significant machining operations:
- (1) one (1) pool mill shoda router, with a maximum throughput of 1,250 pounds of particle board per hour, constructed in 1995, utilizing a dust collector (0429) for particulate control, and exhausting through one (1) stack (S/V ID: 0429s); and
 - (2) one (1) archery machining operation and one (1) pool mill machining operation, constructed in 1968, with a total maximum throughput of 22,000 pounds of fiberglass and particle board per hour, all utilizing one (1) baghouse (0329) for particulate control, and exhausting through one (1) stack (S/V ID: 0329s).
- (e) The following operations for the Murrey pool table manufacturing:
- (1) Two (2) finishing spray booths, identified as M 0700 and M 0701 and constructed in 2002, each with a maximum capacity of coating 0.25 wooden pool tables per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through stacks M 0700s and M 0701s, respectively;
 - (2) One (1) gluing/sanding booth, identified as M 0702 and constructed in 2002, with a maximum capacity of coating 1.33 pool tables per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: M 0702s); and

- (3) Woodworking operation with a raw material input of 642 pounds per hour, constructed in 2002, controlled by a pulse-jet baghouse (M 0704) and exhausting inside the building.
- (f) Two (2) finishing spray booths, identified as C0705 and C0706, constructed in 2005, each with a maximum capacity of 0.75 children's wooden outdoor swing set/play equipment per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through stacks C0705S and C0706S, respectively.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

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

- (a) Degreasing operations that do not exceed 145 gallons (not to include waste solvent shipped off site) per 12 months, except if subject to 326 IAC 20-6 (two (2) Safety-Kleen parts cleaner-wash tanks) [326 IAC 8-3-5(a)]; and
- (b) One (1) B0632 BB area 0.51 mmBtu/hr twin chamber, twin burner bake off oven [326 IAC 4-2].

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

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T163-17594-00008, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, and Evansville EPA, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7]

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

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

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

- (a) The Permittee shall furnish to IDEM, OAQ and Evansville EPA within a reasonable time, any information that IDEM, OAQ and Evansville EPA 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 "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ and Evansville EPA copies of records required to be kept by this permit.

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

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (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 a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

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

and

Evansville EPA
C.K. Newsome Building
100 E. Walnut Street
Suite 100
Evansville, Indiana 47713

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and Evansville EPA, 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 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ and Evansville EPA, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ and Evansville EPA, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and Evansville EPA. IDEM, OAQ and Evansville EPA, 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
Telephone No.: 812-435-6145 (Evansville EPA)
Facsimile No.: 812-435-6155

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

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

and

Evansville EPA
C.K. Newsome Building
100 E. Walnut Street
Suite 100
Evansville, Indiana 47713

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 2-7-5(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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ and Evansville EPA may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ and Evansville EPA 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 2-7 and any other applicable rules.
- (g) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ and Evansville EPA shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ and Evansville EPA has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ and Evansville EPA has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T163-17594-00008 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

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

and

Evansville EPA
C.K. Newsome Building
100 E. Walnut Street
Suite 100
Evansville, Indiana 47713

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ and Evansville EPA 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 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ and Evansville EPA 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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ and Evansville EPA at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ and Evansville EPA may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (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 2-7-4. 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 "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

and

Evansville EPA
C.K. Newsome Building
100 E. Walnut Street
Suite 100
Evansville, Indiana 47713

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit;
and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and Evansville EPA on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ and Evansville EPA takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and Evansville EPA, any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- and
- Evansville EPA
C.K. Newsome Building
100 E. Walnut Street
Suite 100
Evansville, Indiana 47713
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request.
[326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

Evansville EPA
C.K. Newsome Building
100 E. Walnut Street
Suite 100
Evansville, Indiana 47713

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and Evansville EPA in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM OAQ, Evansville EPA or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [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, Evansville EPA and U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and
Evansville EPA
C.K. Newsome Building
100 E. Walnut Street
Suite 100
Evansville, Indiana 47713

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ and Evansville EPA 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 or Evansville EPA, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(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 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.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

and

Evansville EPA
C.K. Newsome Building
100 E. Walnut Street
Suite 100
Evansville, Indiana 47713

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-6(1)]

C.7 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

and

Evansville EPA
C.K. Newsome Building
100 E. Walnut Street
Suite 100
Evansville, Indiana 47713

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and Evansville EPA not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and Evansville EPA if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 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 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

and

Evansville EPA
C.K. Newsome Building
100 E. Walnut Street
Suite 100
Evansville, Indiana 47713

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

and

Evansville EPA
C.K. Newsome Building
100 E. Walnut Street
Suite 100
Evansville, Indiana 47713

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

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ and Evansville EPA, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ and Evansville EPA, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;

- (2) review of operation and maintenance procedures and records;
- (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

-
- (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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

-
- (a) Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emission of pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

Evansville EPA
C.K. Newsome Building
100 E. Walnut Street
Suite 100
Evansville, Indiana 47713

The emission statement does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and Evansville EPA, on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

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

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

and

Evansville EPA
C.K. Newsome Building
100 E. Walnut Street
Suite 100
Evansville, Indiana 47713

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and Evansville EPA 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

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

Facility Description [326 IAC 2-7-5(15)] - The following surface coating operations at the plant:

- (a) The following surface coating operations at the Table Tennis production line identified as unit #T1:
- (1) One (1) front spray booth identified as T0178 and constructed in 1968 with a maximum capacity of coating 180 wooden table tennis boards per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: T0178s);
 - (2) One (1) UV Fill machine, identified as T0150 and constructed in 1972, with a maximum capacity of 180 wooden table tennis boards per hour, and exhausting through one (1) stack (S/V ID: T0150s);
 - (3) one (1) undercoater, identified as T0153 and constructed in 1975, with a maximum capacity of coating 180 wooden table tennis boards per hour, utilizing roller application, and exhausting through two (2) stacks (S/V ID: T0153As, T0153Bs), respectively;
 - (4) one (1) precision coater, identified as T0154 and constructed in 1992, with a maximum capacity of coating 180 wooden table tennis boards per hour, utilizing roller application, and exhausted through one (1) stack (S/V ID: T0154s);
 - (5) one (1) back spray booth, identified as T0362 and constructed in 1990, with a maximum capacity of coating 72 wooden table tennis boards per hour, utilizing HVLP application with dry filters for overspray control and exhausted through one (1) stack (S/V ID: T0362s).
 - (6) one (1) undercoater with an electric oven, identified as T0156 and constructed in 2000, with a maximum capacity of coating 138 wooden table tennis boards per hour, utilizing roller application, and exhausting through one (1) stack (S/V ID: T0156s).
 - (7) One (1) table tennis board silk screen machine, identified as T0396 and constructed in 2000, capable of painting 140 units per hour.
 - (8) One (1) UV drying oven, identified as T0398 and constructed in 2000 rated at 50 KW.
 - (9) One (1) clean-up area, identified as T0399 and constructed in 2000, with a maximum usage rate of 0.28 gallon of solvent per hour.
- (b) The following surface coating operations at the Archery Spray Booth production line identified as Unit# ASB:
- (1) One (1) surface coating booth, identified as AO311 and constructed in 1968, with a maximum capacity of coating 135 fiberglass bow limbs per hour, utilizing HVLP application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: AO311s)
- (c) The following operations for the Murrey pool table manufacturing:
- (1) Two (2) finishing spray booths, identified as M 0700 and M 0701, constructed in 2002 and modified in 2005, each with a maximum capacity of coating 0.25 wooden pool tables per hour and 1.0 children's wooden outdoor swing set/play equipment per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through stacks M 0700s and M 0701s, respectively;
 - (2) One (1) gluing/sanding booth, identified as M 0702, constructed in 2002 and modified in 2005, with a maximum capacity of coating 1.33 pool tables per hour and 1.0 children's wooden outdoor swing set/play equipment per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through one (1) stack (S/V ID: M 0702s).

SECTION D.1 Cont'd

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - The following surface coating operations at the plant:

- (d) Two (2) finishing spray booths, identified as C0705 and C0706, constructed in 2005, each with a maximum capacity of 0.75 children's wooden outdoor swing set/play equipment per hour, utilizing High Volume-Low Pressure (HVLP) application with dry filters for overspray control, and exhausting through stacks C0705S and C0706S, respectively.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the table tennis surface coating booths identified as T0178, T0153, T0154, T0156 and T0362, the children's wooden outdoor swing set/play equipment finishing spray booths C0705 and C0706, and the pool table finishing spray booths M 0700 and M 0701 shall utilize one of the following application methods:

Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating operations 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.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5] [326 IAC 2-2]

The VOC input to the manufacturing operation of children's wooden outdoor swing sets / play equipment in the Murrey Pool Table Manufacturing area shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. This is based on the VOC input of the green primer, enamel topcoat, sand box sealer, wood stain, exterior oil, and VOC solvents input to the units. The VOC usage limit shall ensure compliance with the provisions of 326 IAC 2-7-10.5 (d)(4)(A).

D.1.4 Hazardous Air Pollutant (HAP) Minor Limit

The usage of total combination of HAPs and any single HAP at the surface coating processes (Table Tennis Unit # T1, Murrey Pool and Archery Spray Booth) shall be limited to less than 15 and 9.9 tons per twelve (12) consecutive month period, respectively. Compliance with these limits in conjunction with the total combination of HAPs and any single HAP limits in Condition D.3.1 shall limit source-wide emissions of total combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively, and make the requirements of 40 CFR Part 63, Subpart PPPP and Subpart A not applicable.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC and HAP usage limitations contained in Conditions D.1.3 and D.1.4 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.

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

D.1.6 Monitoring

- (a) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily manometer pressure checks shall be performed on the surface coating booths (T0178, T0362, AO326, AO311), the finishing spray booths (C0705, C0706, M 0700 and M 0701) and the gluing/sanding booth (M 0702) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed for the coating emissions from the stack and the presence of overspray on the nearby ground and annual inspections shall be performed for the presence of overspray on the rooftop. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily manometer pressure checks, monthly inspections.

- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limit established in Condition D.1.3 for the manufacture of children's wooden outdoor swing sets / play equipment in the Murrey Pool Table Manufacturing area. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The VOC content (weight percent) of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.1.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (4) The total HAP usage for each month; and
 - (5) The weight of HAPs emitted for each compliance period.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.3 and D.1.4 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 "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]	
(a)	The following significant machining operations:
(1)	one (1) pool mill shoda router, with a maximum throughput of 1,250 pounds of particle board per hour, constructed in 1995, utilizing a dust collector (0429) for particulate control, and exhausting through one (1) stack (S/V ID: 0429s);
(2)	one (1) archery machining operation, and one (1) pool mill machining operation, constructed in 1968, with a total maximum throughput of 22,000 pounds of fiberglass and particle board per hour, all utilizing one (1) baghouse (0329) for particulate control, and exhausting through one (1) stack (S/V ID: 0329s); and
(b)	Woodworking operation with a raw material input of 642 pounds per hour, controlled by a pulse-jet baghouse (M 0704) and exhausting inside the building.
(The information describing the process in this facility description is descriptive information and does not constitute enforceable condition.)	

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2] [326 IAC 2-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the following facilities shall not exceed the limits as stated when operating at the respective process weight rates:

Emission Unit	Process Weight Rate (tons/hr)	Allowable Particulate Emission Rate (326 IAC 6-3-2) (lb/hr)
one (1) pool mill shoda router	0.625	2.99
one (1) archery machining operation, and one (1) pool mill machining operation	11	20.44
Woodworking Operation	0.321	1.91

The pounds per hour limitations were calculated with the following equation:

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

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

Compliance with 326 IAC 6-3-2 limits will limit the PM and PM 10 (assuming PM = PM10) emissions to 110.98 tons per year and this limit will render the requirements of 326 IAC 2-2 not applicable.

Compliance Determination Requirements

D.2.2 Particulate Control

- (a) In order to comply with condition D.2.1 the baghouse / dust controllers 0329, M 0704, and 0429 for particulate control shall be in operation and control emissions from the archery machining centers and pool area machining centers, woodworking operations and pool mill shoda router respectively at all times that the archery machining centers and pool area machining centers, woodworking operations and pool mill shoda router are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.3 Visible Emissions Notations [40 CFR Part 64]

- (a) Daily visible emission notations of the dust controllers 0429 and 0329 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.4 Parametric Monitoring [40 CFR Part 64]

The Permittee shall record the pressure drop across the each baghouse (O329 and O429) used in conjunction with the archery machining centers and pool area machining centers, basketball area powermatic CNC router, and pool mill shoda router, at least once weekly when the woodworking and plastics machining processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across each baghouse is outside the normal range specified below or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

<u>Baghouse</u>	<u>Pressure Drop</u>
O329	0.8 - 5.0 inches of water
O330	1.0 - 5.0 inches of water
O429	0.8 - 2.0 inches of water

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

D.2.5 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.2.6 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the baghouse/dust controller (O329, and O429) stack exhaust.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain the following:
 - (1) Weekly records of the total static pressure drop during normal operation when venting to the atmosphere.
 - (2) Documentation of the dates vents are redirected.
- (c) 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 2-7-5(15)] - The following fiberglass manufacturing operations:

(a) One (1) archery fiberglass string roving bow molding operation and constructed in 1967, identified as Unit# ABM, with a maximum capacity of producing 99 bows per hour, consisting of four (4) resin mix tanks exhausting through one (1) stack (S/V ID: A0053s), four (4) wrapping stations, and four (4) heated bow mold presses, each exhausted inside the plant;

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

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

D.3.1 Hazardous Air Pollutant (HAP) Minor Limit

- (a) The styrene input at the archery bow molding process shall be limited to less than 90.8 tons per 12 consecutive month period, with compliance determined at the end of each month.
- (b) The styrene flash-off rate from the archery bow molding process shall not exceed 5%.
- (c) The solvent input at the archery bow molding process shall be limited to less than 10.72 tons per 12 consecutive month period, with compliance determined at the end of each month.
- (d) The methanol content of the solvent used at the archery bow molding process shall not exceed 50% and shall contain no other HAPs.

Compliance with these limits in conjunction with the limits in D.1.4 shall limit the source-wide potential to emit of single HAP and combined HAP emissions to less than 10 and 25 tons per 12 consecutive month period, respectively, and make the requirements of 40 CFR Part 63, Subpart WWWW and Subpart A not applicable.

Compliance Determination Requirements

D.3.2 Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the HAP usage limitation contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.3.3 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.3.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The HAP content of each coating material and solvent used.

- (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month; and
 - (4) The total HAP usage for each month.
 - (5) The styrene flash-off rate from the archery bow molding process.
 - (6) The percent by weight methanol content of the solvent used at the archery bow molding process.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] - The following specifically regulated insignificant activities:

- (a) Degreasing operations that do not exceed 145 gallons (not to include waste solvent shipped off site) per 12 months, except if subject to 326 IAC 20-6 (two (2) Safety-Kleen parts cleaner-wash tanks).
- (b) One (1) B0632 BB area 0.51 mmBtu/hr twin chamber, twin burner bake off oven.
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (e) One (1) basketball backboard powder coating lines, each operating within a fully enclosed, fully air-conditioned system for the capture and recycling of powder.

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

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

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

The two (2) Safety-Kleen cold cleaner degreasers (parts washers) shall comply with the following operating and control requirements:

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.4.2 Particulate Matter (PM) [326 IAC 4-2]

Pursuant to Evansville EPA Operating Permit #R-008-002-001, issued on February 1, 1995, the one (1) B0632 BB area 0.51 mmBtu/hr twin burner, twin burner bake off oven used to bake off cured paint residue from bake oven racks shall not emit PM in excess of 0.5 pounds per one thousand (1000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air.

D.4.3 Particulate Matter (PM) [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 trimmers, grinding and machining operations, buffing, polishing, abrasive blasting, pneumatic conveying, woodworking operations and the basketball backboard powder coating lines shall not exceed the allowable 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:

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and the
Evansville Environmental Protection Agency**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Indian Industries, Inc., DBA Escalade Sports
Source Address: 817 Maxwell Avenue, Evansville, IN 47711
Mailing Address: P.O Box 889, Evansville, IN 47706
Part 70 Permit No.: T163-17594-00008

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

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
and the
Evansville Environmental Protection Agency**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Indian Industries, Inc., DBA Escalade Sports
Source Address: 817 Maxwell Avenue, Evansville, IN 47711
Mailing Address: P.O Box 889, Evansville, IN 47706
Part 70 Permit No.: T163-17594-00008

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">C 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); andC 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
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

Part 70 Quarterly Report

Source Name: Indian Industries, Inc. dba Escalade Sports
Source Address: 817 Maxwell Ave. Evansville, IN 47711
Mailing Address: P.O Box 889, Evansville, IN 47706
Part 70 Permit No.: T163-17594-00008
Facility: Murrey pool table manufacturing area used for producing children's swing sets / play equipment
Parameter: Volatile Organic Compounds (VOC)
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Indian Industries, Inc. dba Escalade Sports
Source Address: 817 Maxwell Ave. Evansville, IN 47711
Mailing Address: P.O Box 889, Evansville, IN 47706
Part 70 Permit No.: T163-17594-00008
Facility: Surface Coating Processes (Table Tennis Unit # T1, Murrey Pool and Archery Spray Booth)
Parameter: Hazardous Air Pollutants (HAPs)
Limit: Less than 9.9 tons and 15 tons per 12 consecutive month period for any single HAP and total HAP, respectively, with compliance determined at the end of each month.

YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Indian Industries, Inc. dba Escalade Sports
 Source Address: 817 Maxwell Ave. Evansville, IN 47711
 Mailing Address: P.O Box 889, Evansville, IN 47706
 Part 70 Permit No.: T163-17594-00008
 Facility: Archery Bow Molding (Unit# ABM)
 Parameter: Hazardous Air Pollutants (HAPs)
 Limit: (a) The styrene input at the archery bow molding process shall be limited to less than 90.8 tons per 12 consecutive month period, with compliance determined at the end of each month.
 (b) The solvent input at the archery bow molding process shall be limited to less than 10.72 tons per 12 consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

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

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and the
Evansville Environmental Protection Agency**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Indian Industries, Inc., DBA Escalade Sports
Source Address: 817 Maxwell Avenue, Evansville, IN 47711
Mailing Address: P.O Box 889, Evansville, IN 47706
Part 70 Permit No.: T163-17594-00008

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Indian Industries, Inc., DBA Escalade Sports
Source Location:	817 Maxwell Ave., Evansville, Indiana 47711
County:	Vanderburgh
SIC Code:	3949
Operation Permit No.:	T163-17594-00008
Operation Permit Issuance Date:	February 2, 2005
Significant Permit Modification No.:	163-22258-00008
Permit Reviewer:	Alic Bent/EVP

On March 1, 2006, the Office of Air Quality (OAQ) had a notice published in the Evansville Courier in Evansville, Indiana, stating that Indian Industries, Inc., DBA Escalade Sports had applied for a significant permit modification to Part 70 permit T163-17594-00008. This notice was for a modification to their Title V permit to include enforceable permit conditions limiting source-wide HAP emissions below major thresholds, and delete all conditions in Sections D.1 and D.3 related to 40 CFR 63, Subparts PPPP and WWWW applicability, respectively. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Permit. Bolded language has been added and the language with a line through it has been deleted.

- The signature delegation on the cover page of the permit has been changed as follows:

2nd Significant Permit Modification No.:163-22258-00008	Pages Affected: Entire Permit
Issued by: Paul Dubenetzky, Assistant Commissioner Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: February 2, 2010

2. In the Nonrule Policy Document AIR 007 NPD, a table is given as an example for how sources can submit annual compliance certifications. B.9 Annual Compliance Certification has been revised to remove "in letter form" so that it does not contradict the guidance.

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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 15th of each year to:

3. The word "in" has been removed from the second sentence of B.12 to be consistent with 326 IAC 2-7-15(a).

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed ~~in~~ compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

4. The solvent cleaner usage limit in Condition D.3.1 (c) has been revised. The new solvent cleaner usage limit, in conjunction with the limits in D.1.4 and D.3.1 (a), (b) and (d) will result in a total source-wide HAP emission limit of 24.885 tons per 12 consecutive month period which will provide an enforceable limit and make the requirements of NESHAPs Subparts WWWW and PPPP not applicable to this source. The reporting form was also revised accordingly.

D.3.1 Hazardous Air Pollutant (HAP) Minor Limit

- (a) The styrene input at the archery bow molding process shall be limited to less than 90.8 tons per 12 consecutive month period, with compliance determined at the end of each month.
- (b) The styrene flash-off rate from the archery bow molding process shall not exceed 5%.
- (c) The solvent input at the archery bow molding process shall be limited to less than ~~44.03~~ **10.72** tons per 12 consecutive month period, with compliance determined at the end of each month.
- (d) The methanol content of the solvent used at the archery bow molding process shall not exceed 50% and shall contain no other HAPs.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Permit Modification.

Source Description and Location

Source Name:	Indian Industries, Inc., DBA Escalade Sports
Source Location:	817 Maxwell Ave., Evansville, Indiana 47711
County:	Vanderburgh
SIC Code:	3949
Operation Permit No.:	T163-17594-00008
Operation Permit Issuance Date:	February 2, 2005
Significant Permit Modification No.:	163-22258-00008
Permit Reviewer:	Alic Bent /EVP

Existing Approvals

The source was issued a Part 70 Operating Permit T163-17594-00008 on February 2, 2005. The source has since received the following approvals:

- (a) First Minor Source Modification No. 163-20506-00008 issued on February 22, 2005;
- (b) First Significant Permit Modification No. 163-20069-00008 issued on May 16, 2005;
- (c) Review Request No. 163-21149-00008 issued on July 12, 2005;
- (d) First Administrative Amendment No. 163-21401-00008 issued on July 28, 2005;
- (e) Second Minor Source Modification No. 163-21866-00008 issued on November 15, 2005;
and
- (f) First Minor Permit Modification No. 163-21902-00008 issued on January 18, 2006.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
PM10	Attainment
PM2.5	Nonattainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the

Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Vanderburgh County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for emission offset, 326 IAC 2-3.

- (b) U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Vanderburgh County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (c) Vanderburgh County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (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 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	149.13
PM10	150.39
SO ₂	0.00
VOC	185.49
CO	14.04
NO _x	0.00

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is a major stationary source, under Emission Offset (326 IAC 2-3), because a nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (c) These emissions are based upon First Minor Source Modification 163-21866-00008 issued on November 15, 2005.

The table below summarizes the potential to emit HAPs for the entire source, prior to the

proposed modification, after consideration of all enforceable limits established in the effective permits:

HAP's	Potential To Emit (tons/year)
Styrene	12.49
MEK	6.89
Xylene	5.92
Methanol	14.74
Glycol Ethers	13.24
Toluene	18.27
Dibutyl Pthalate	1.19
TOTAL	72.74

The table below summarizes the HAP potential to emit from each HAP emitting unit, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

	Potential To Emit (tons/year)
Process/emission unit	HAPs
Bow Molding	27.23
Murrey Pool	2.47
Table Tennis	14.21
Archery Spray Booth	28.83
Total PTE	72.74

This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	No data
PM10	5.0
SO ₂	No data
VOC	7.0
CO	No data
NO _x	No data
HAP (specify)	No data

Background and Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Indian Industries, Inc., DBA Escalade Sports on December 5, 2005, relating to the following:

- (a) Modifying their Title V permit to include enforceable permit conditions limiting source-wide HAP emissions below major thresholds, and the deletion of all conditions in Sections D.1 and D.3 relating to 40 CFR 63, Subpart PPPP and Subpart WWWW applicability, respectively.

The requirements of 40 CFR 63.4480, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products) are applicable to plastic parts and products surface coating facilities that are major sources of HAP emissions. This source is a major source of HAPs and the painting operation applies surface coating to plastic parts and products, as defined in 40 CFR 63.4481(a). Since this rule has a future compliance date of April 19, 2007, the source may opt for emission limits which will limit HAP emissions to less than major thresholds.

The source has opted to limit the source-wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of Subpart PPPP in Section D.1 of the Title V operating permit T163-17594-00008 will be deleted and enforceable permit conditions limiting source-wide HAP emissions below major thresholds will be added.

The requirements of 40 CFR Part 63 Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) are applicable to all reinforced plastic composites production facilities located at plant sites that are major sources of HAP emissions. This source performs reinforced plastic composites production and is a major source of Hazardous Air Pollutants (HAPs). Since this rule has a future compliance date of April 21, 2006, the source may opt for emission limits which will limit HAP emissions to less than major thresholds.

The source has opted to limit the source-wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of Subpart WWWW in Section D.3 of the Title V operating permit T163-17594-00008 will be deleted and enforceable permit conditions limiting source-wide HAP emissions below major thresholds will be added.

- (b) Removing the gun cleaner in Sections A.2 (e)(4) and D.1 (c)(3) of the Title V permit, and the corresponding Condition D.1.4. This unit does not exist at the plant.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Permit Level Determination – Part 70

There is no increase in emissions from the modification to this Part 70 permit. Therefore, the Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(d)(1) which states “every significant change in existing monitoring Part 70 permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions shall be considered significant”, because it involves the removing of permit conditions and the addition of enforceable permit conditions limiting source-wide HAP emissions below major thresholds.

Federal Rule Applicability Determination

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this review.
- (b) The requirements of 40 CFR 63.4480, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products) are applicable to plastic parts and products surface coating facilities that are major sources of HAP emissions. Since this rule has a future compliance date of April 19, 2007, the source may opt for emission limits which will limit HAP emissions to less than major thresholds.

The source has opted to limit the source-wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products) do not apply to this source.

- (c) The requirements of 40 CFR Part 63 Subpart WWWW (National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production) are applicable to all reinforced plastic composites production facilities located at plant sites that are major sources of HAP emissions. This source performs reinforced plastic composites production and is a major source of Hazardous Air Pollutants (HAPs). Since this rule has a future compliance date of April 21, 2006, the source may opt for emission limits which will limit HAP emissions to less than major thresholds.

The source has opted to limit the source-wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63, Subpart WWWW (Reinforced Plastic Composites Production) do not apply to this source.

State Rule Applicability Determination

There are no new State Rules included in this permit due to this modification.

Proposed Changes

- 1. The "One gun cleaner" in Sections A.2 (e)(4) and D.1 (c)(3) does not exist at the plant and has been removed. The corresponding Condition D.1.4 has also been removed.

- (c) The following operations for the Murrey pool table manufacturing:

- (4) ~~One (1) gun cleaner, constructed in 2005, with a maximum usage rate of 0.01 gallons of solvent per hour.~~

~~D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-2] Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee of gun cleaning facilities in the Murrey pool table manufacturing area shall:~~

- (a) ~~Equip the cleaner with a cover;~~

- ~~(b) Equip the cleaner with a facility for draining cleaned parts;~~
- ~~(c) Close the degreaser cover whenever parts are not being handled in the cleaner;~~
- ~~(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;~~
- ~~(e) Provide a permanent, conspicuous label summarizing the operation requirements;~~
- ~~(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.~~

2. The following conditions in Section D.1 of the Title V Operating Permit No.T163-17594-00008 have been removed to reflect the non-applicability of Subpart PPPP and enforceable permit conditions limiting source-wide HAP emissions below major thresholds have been added: Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

~~D.1.6 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart PPPP] [40 CFR 63.4501]~~

- ~~(a) The provisions of 40 CFR Part 63, Subpart A—General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the surface coating booth, identified as AO311, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart PPPP. The Permittee must comply with these requirements on and after April 19, 2004.~~
- ~~(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.~~

~~D.1.7 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products [40 CFR Part 63, Subpart PPPP] [40 CFR 63.4481] [40 CFR 63.4482] [40 CFR 63.4483(b)] [40 CFR 63.4581]~~

- ~~(a) The provisions of 40 CFR Part 63, Subpart PPPP (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products) apply to the surface coating booth, identified as AO311. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/plastic/plasticpg.html>. Pursuant to 40 CFR 63.4483(b), the Permittee must comply with these requirements on and after April 19, 2007.~~
- ~~(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.~~
- ~~(c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart PPPP:
 - ~~(1) All coating operations as defined in 40 CFR 63.4581;~~
 - ~~(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;~~
 - ~~(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and~~
 - ~~(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating~~~~

operation.

- (d) ~~Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4581, and are applicable to the affected source.~~

~~D.1.11 Notification Requirements [40 CFR 63.4510]~~

- (a) ~~General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the surface coating booth, identified as AO311, by the dates specified in these sections, except as provided in 40 CFR 63.4510, paragraphs (b) and (c).~~
- (b) ~~Initial notification. The Permittee must submit the initial notification no later than April 19, 2005. If using compliance with the Automobiles and Light-Duty Trucks NESHAP (40 CFR Part 63, Subpart IIII) under 40 CFR 63.4881(d) to constitute compliance with this subpart for the plastic part coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart. If complying with another NESHAP that constitutes the predominant activity at the facility under 40 CFR 63.4481(e)(2) to constitute compliance with this subpart for the plastic coating operations, then the Permittee must include a statement to this effect in the initial notification and no other notifications are required under this subpart.~~
- (c) ~~Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4540, 40 CFR 63.4550, or 40 CFR 63.4560 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4510(c), paragraphs (1) through (11) and in 40 CFR 63.9(h).~~

~~D.1.12 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]~~

~~The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.~~

- (a) ~~The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart PPPP, a description of the surface coating booth, identified as AO311, and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.~~
- (b) ~~The significant permit modification application shall be submitted no later than July 19, 2006.~~
- (c) ~~The significant permit modification application shall be submitted to:
Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2254~~

and

Evansville EPA
C.K. Newsome Building
100 E. Walnut Street
Suite 100
Evansville, Indiana 47713

D.1.4 Hazardous Air Pollutant (HAP) Minor Limit

The usage of total combination of HAPs and any single HAP at the surface coating processes (Table Tennis Unit # T1, Murrey Pool and Archery Spray Booth) shall be limited to less than 15 and 9.9 tons per twelve (12) consecutive month period, respectively. Compliance with these limits in conjunction with the total combination of HAPs and any single HAP limits in Condition D.3.1 shall limit source-wide emissions of total combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively, and make the requirements of 40 CFR Part 63, Subpart PPPP and Subpart A not applicable.

D.1.85 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC and HAP usage limitations contained in Conditions ~~D.1.4~~ **D.1.3 and D.1.4** 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.1.407 Record Keeping Requirements

(c) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.1.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The HAP content of each coating material and solvent used.
- (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The cleanup solvent usage for each month;
- (4) The total HAP usage for each month; and
- (5) The weight of HAPs emitted for each compliance period.

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

D.1.438 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.4 D.1.3 and D.1.5 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 an ~~an "authorized individual" as defined by 326 IAC 2-1.1-1(1)~~ **the "responsible official" as defined by 326 IAC 2-7-1(34).**

OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Indian Industries, Inc. dba Escalade Sports
Source Address: 817 Maxwell Ave. Evansville, IN 47711
Mailing Address: P.O Box 889, Evansville, IN 47706
Part 70 Permit No.: T163-17594-00008
Facility: Surface Coating Processes (Table Tennis Unit # T1, Murrey Pool and Archery Spray Booth)
Parameter: Hazardous Air Pollutants (HAPs)
Limit: Less than 9.9 tons and 15 tons per 12 consecutive month period for any single HAP and total HAP, respectively, with compliance determined at the end of each month.

YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

3. The following conditions in Section D.3 of the Title V Operating Permit No.T163-17594-00008 have been removed to reflect the non-applicability of Subpart WWWW and enforceable permit

conditions limiting source-wide HAP emissions below major thresholds have been added: Deleted language appears as strikethroughs and new language appears in **bold**:

~~D.3.1. General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]~~

- (a) ~~The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the reinforced plastic composites production described in 40 CFR 63.5790(b), except when otherwise specified in 40 CFR 63 Subpart WWWW.~~
- (b) ~~Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.~~

~~D.3.2 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production [40 CFR Part 63.5805, Subpart WWWW]~~

- (a) ~~The reinforced plastic composites production affected source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, (40 CFR 63, Subpart WWWW), effective April 21, 2003. Pursuant to this rule, the Permittee must comply with Subpart WWWW by April 21, 2006, or accept and meet an enforceable HAP emissions limit below the major source threshold prior to April 21, 2006. Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.~~
- (b) ~~The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart WWWW:~~
- (1) ~~One (1) archery fiberglass string roving bow molding operation, identified as Unit# ABM~~
- (c) ~~The definitions of 40 CFR 63, Subpart WWWW at 40 CFR 63.5935 are applicable to the affected source.~~

~~D.3.3 National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - Notification Requirements [40 CFR 63, Subpart WWWW]~~

- (a) ~~Pursuant to 40 CFR 63.5905, the Permittee shall submit all of the notifications in Table 13 of 40 CFR 63, Subpart WWWW that apply to the affected source and chosen compliance method by the dates specified. These notifications include, but are not limited to, the following::~~
- (1) ~~An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than August 19, 2003.~~
- (2) ~~If complying with organic HAP emissions limit averaging provisions, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2007.~~
- (3) ~~If complying with organic HAP content limits, application equipment requirements, or organic HAP emissions limit other than organic HAP emissions limit averaging, the Permittee shall submit a Notification of Compliance Status, containing the information specified in 40 CFR 63.9(h), no later than May 21, 2006.~~
- (4) ~~If complying by using an add-on control device, the Permittee shall submit:~~

~~(A) — A notification of intent to conduct a performance test as specified in 40 CFR 63.9(e), at least 60 calendar days before the performance test is scheduled to begin.~~

~~(B) — A notification of the date for the CMS performance evaluation, if required, as specified in 40 CFR 63.9(g), by the date of submission of the notification of intent to conduct a performance test.~~

~~(C) — A Notification of Compliance Status as specified in 40 CFR 63.9(h), no later than 60 calendar days after the completion of the add-on control device performance test and CMS performance evaluation.~~

~~(b) — The notifications required by paragraph (a) shall be submitted to:~~

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

~~and~~

~~Evansville EPA
C.K. Newsome Building
100 E. Walnut Street
Suite 100
Evansville, Indiana 47713~~

~~and~~

~~United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590~~

~~The notifications require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~D.3.4 — Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]~~

~~The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.~~

~~(a) — The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart VVVVV, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.~~

~~(b) — The significant permit modification application shall be submitted no later than nine months before April 21, 2006.~~

~~(c) — The significant permit modification application shall be submitted to:~~

~~Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2254~~

and

~~Evansville EPA
C.K. Newsome Building
100 E. Walnut Street
Suite 100
Evansville, Indiana 47713~~

D.3.1 Hazardous Air Pollutant (HAP) Minor Limit

- (a) The styrene input at the archery bow molding process shall be limited to less than 90.8 tons per 12 consecutive month period, with compliance determined at the end of each month.
- (b) The styrene flash-off rate from the archery bow molding process shall not exceed 5%.
- (c) The solvent input at the archery bow molding process shall be limited to less than 11.03 tons per 12 consecutive month period, with compliance determined at the end of each month.
- (d) The methanol content of the solvent used at the archery bow molding process shall not exceed 50% and shall contain no other HAPs.

Compliance with these limits in conjunction with the limits in D.1.4 shall limit the source-wide potential to emit of single HAP and combined HAP emissions to less than 10 and 25 tons per 12 consecutive month period, respectively, and make the requirements of 40 CFR Part 63, Subpart WWWW and Subpart A not applicable.

D.3.2 Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the HAP usage limitation contained in Condition D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.3 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP emission limits established in Condition D.3.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The cleanup solvent usage for each month; and
 - (4) The total HAP usage for each month.
 - (5) The styrene flash-off rate from the archery bow molding process.
 - (6) The percent by weight methanol content of the solvent used at the archery bow molding process.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Part 70 Quarterly Report

Source Name: Indian Industries, Inc. dba Escalade Sports
Source Address: 817 Maxwell Ave. Evansville, IN 47711
Mailing Address: P.O Box 889, Evansville, IN 47706
Part 70 Permit No.: T163-17594-00008
Facility: Archery Bow Molding (Unit# ABM)
Parameter: Hazardous Air Pollutants (HAPs)
Limit: (a) The styrene input at the archery bow molding process shall be limited to less than 90.8 tons per 12 consecutive month period, with compliance determined at the end of each month.
 (b) The solvent input at the archery bow molding process shall be limited to less than 11.03 tons per 12 consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

4. Conditions B.2, B.7, B.13 and B.16 (now re-numbered B.17) have been revised and Condition B.3 added to the permit to further address and clarify the permit term and the term of the conditions. Condition B.4 (Termination of Right to Operate) has been moved and re-numbered B.14. All other Section B conditions have been re-numbered accordingly.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, **T163-17594-00008**, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date **of this permit**.
- (b) **If IDEM, OAQ, and Evansville EPA, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.**

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

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

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of ~~previous permits~~ **established prior to T163-17594-00008 and issued pursuant to permitting programs approved into the state implementation plan have been either:**
- (1) incorporated as originally stated,
 - (2) revised **under 326 IAC 2-7-10.5**, or
 - (3) deleted **under 326 IAC 2-7-10.5**.
- ~~by this permit.~~
- (b) **Provided that all terms and conditions are accurately reflected in this combined permit, a**All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.167 Permit Renewal [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and Evansville EPA and shall include the information specified in 326 IAC 2-7-4. 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 "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

and

Evansville EPA
C.K. Newsome Building
100 E. Walnut Street
Suite 100
Evansville, Indiana 47713

(b) ~~Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]~~

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

~~(A) (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and~~

~~(B) (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~

~~(2) — If IDEM, OAQ and Evansville EPA, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.~~

(c) ~~Right to Operate After Application for Renewal [326 IAC 2-7-3]~~

~~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 2-7 until IDEM, OAQ and Evansville EPA takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and Evansville EPA, any additional information identified as being needed to process the application.~~

(d) ~~United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]~~

~~If IDEM, OAQ and Evansville EPA fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.~~

5. Upon further review, IDEM, OAQ has determined that it is not necessary to include a condition requiring a preventive maintenance plan in each individual Section D of the permit. Rather, a general condition will be placed in Section B of the permit, which will apply to the entire source.

Conditions D.1.3 and D.2.2 have been removed from the permit, and item (a) in Section B has been revised. Additionally, IDEM, OAQ has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Section B – Preventive Maintenance, and has amended the Section B – Emergency Provisions condition as follows:

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

-
- (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:~~ **for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:**
- (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)~~ **(b)** A copy of the PMPs shall be submitted to IDEM, OAQ and Evansville EPA, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and Evansville EPA. IDEM, OAQ and Evansville EPA, 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 “responsible official” as defined by 326 IAC 2-7-1(34).
- ~~(d)~~ **(c)** To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

-
- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
Telephone No.: 812-435-6145 (Evansville EPA)
Facsimile No.: 812-435-6155

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

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

and

Evansville EPA
C.K. Newsome Building
100 E. Walnut Street
Suite 100
Evansville, Indiana 47713

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 2-7-5(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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not**

cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ and Evansville EPA may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ and Evansville EPA 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 2-7 and any other applicable rules.
- (g) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

~~D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for C0705, C0706, M 0700, M 0701, M 0702, T0178, T0362, and AO311, and their corresponding dry filter control devices.~~

~~D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for the significant machining operations and wood working operations and baghouses /dust controller listed in this section.~~

- 6. Upon further review, IDEM has decided to remove (d) concerning nonroad engines from B.18 Permit Amendment or Modification. 40 CFR 89, Appendix A specifically indicates that states are not precluded from regulating the use and operation of nonroad engines, such as regulations on hours of usage, daily mass emission limits, or sulfur limits on fuel; nor are permits regulating such operations precluded, once the engine is no longer new.

~~B.4718 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]~~

~~(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.~~

- 7. IDEM, OAQ has clarified the Condition B.20 (Operational Flexibility) as follows:

~~B.4920 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]~~

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions, which exceed the ~~emissions allowable~~ **under limitations provided in this** permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

Evansville EPA
C.K. Newsome Building
100 E. Walnut Street
Suite 100
Evansville, Indiana 47713

and

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

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

- (5) The Permittee maintains records on-site, **on a rolling five (5) year basis**, which document, ~~on a rolling five (5) year basis~~, all such changes and emissions ~~trading trades~~ that are subject to 326 IAC 2-7-20(b), (c), or (e). ~~and makes The~~ **Permittee shall make** such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and Evansville EPA in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade **emissions** increases and decreases ~~in emissions in~~ at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM OAQ, Evansville EPA or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

8. IDEM, OAQ has decided that it is best to have this requirement under compliance determination in the specific D conditions, and remove Condition C.6.

~~C.6 — Operation of Equipment [326 IAC 2-7-6(6)]~~

~~Except as otherwise provided by statute or 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 unit(s) vented to the control equipment is in operation.~~

9. IDEM, OAQ realizes that the specifications in Condition C.12 (Other Instrument Specifications) can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. Upon further review, IDEM, OAQ has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from the condition.

~~C.121 Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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~~ **When required by an condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected normal maximum reading for the normal range shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (+2%) of full scale reading.**
- (b) The Permittee may request **that** the IDEM, OAQ approve the use of a ~~pressure gauge or other~~ **an** instrument that does not meet the above specifications provided the Permittee can demonstrate **that** an alternative ~~pressure gauge or other~~ instrument specification will adequately ensure compliance with permit conditions requiring the measurement of ~~pressure drop or other~~ **the** parameters.

10. IDEM, OAQ has reconsidered the requirement to develop and follow a Compliance Response

Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C condition:

C.154 ~~Compliance Response Plan—Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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

- ~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.~~
- ~~(3) An automatic measurement was taken when the process was not operating.~~
- ~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~
- ~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~
- ~~(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (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.~~
- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.**
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions).**

Corrective actions may include, but are not limited to, the following:

- (1) initial inspection and evaluation;**
- (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or**
- (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.**
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:**
- (1) monitoring results;**
- (2) review of operation and maintenance procedures and records;**
- (3) inspection of the control device, associated capture system, and the process.**

- (d) **Failure to take reasonable response steps shall be considered a deviation from the permit.**
- (e) **The Permittee shall maintain the following records:**
 - (1) **monitoring data;**
 - (2) **monitor performance data, if applicable; and**
 - (3) **corrective actions taken.**

11. The monitoring condition has been revised to reflect the new Condition C.14 - Response to Excursions or Exceedances, and to remove the additional inspections for the Preventive Maintenance Plan.

D.1.97 Monitoring

- (a) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily manometer pressure checks shall be performed on the surface coating booths (T0178, T0362, AO326, AO311), the finishing spray booths (C0705, C0706, M 0700 and M 0701) and the gluing/sanding booth (M 0702) while one or more of the booths are in operation. ~~The pressure drop across each booth shall be maintained within the range specified within the Compliance Response Plan. 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.~~ **If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.**
- (b) Monthly inspections shall be performed for the coating emissions from the stack and the presence of overspray on the nearby ground and annual inspections shall be performed for the presence of overspray on the rooftop. ~~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.~~ **When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.**
- (c) ~~Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

D.1.408 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.97, the Permittee shall maintain a log of weekly overspray observations, daily manometer pressure checks, monthly inspections, ~~and these additional inspections prescribed by the Preventive Maintenance Plan.~~

12. Paragraph (a) of the Broken or Failed Baghouse condition has been deleted. For multi-compartment baghouses, the permit will not specify what actions the Permittee needs to take in response to a broken bag. However, a requirement has been added to Condition D.2.2 requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

D.2.32 Particulate Control

- (a) In order to comply with condition D.2.1 the baghouse / dust controllers 0329, M 0704, and 0429 for particulate control shall be in operation and control emissions from the archery machining centers and pool area machining centers, woodworking operations and pool mill shoda router respectively at all times that the archery machining centers and pool area machining centers, woodworking operations and pool mill shoda router are in operation.
- (b) **In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ 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.**
13. Upon further review, IDEM has determined that once per day monitoring of the control device (or of visible emission notations) is generally sufficient to ensure proper operation of the control device. IDEM has also determined that monitoring these parameters once per day is sufficient to satisfy the requirements of the Part 70 rules at 326 IAC 2-7-5 and 326 IAC 2-7-6.

D.2.43 Visible Emissions Notations [40 CFR Part 64]

- (a) Daily visible emission notations of the dust controllers 0429 **and 0329** stack exhausts ~~and once per shift visible emission notations for dust controlled 0329 stack exhaust~~ shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (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 deviation from this permit.~~ **If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.**

D.2.54 Parametric Monitoring [40 CFR Part 64]

The Permittee shall record the ~~total static~~ pressure drop across the each baghouse (O329 and O429) used in conjunction with the archery machining centers and pool area machining centers, basketball area powermatic CNC router, and pool mill shoda router, at least once weekly when the woodworking and plastics machining processes are in operation when venting to the atmosphere. ~~Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each baghouse shall be maintained within the range specified below or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.~~ **When for any one reading, the pressure drop across each baghouse is outside the normal range specified below or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.**

<u>Baghouse</u>	<u>Pressure Drop</u>
O329	0.8 - 5.0 inches of water
O330	1.0 - 5.0 inches of water
O429	0.8 - 2.0 inches of water

The instrument used for determining the pressure shall comply with Section C - ~~Pressure Gauge Instrument~~ Specifications, of this permit, shall be subject to approval by IDEM, ~~OAM~~ **OAQ**, and the Evansville Environmental Protection Agency and shall be calibrated at least once every six (6) months.

14. Paragraph (b) of this condition has been revised for those processes that operate in batch mode. The condition required an emission unit to be shut down immediately in case of baghouse failure. However, IDEM is aware there can be safety issues with shutting down a process in the middle of a batch. IDEM also realizes that in some situations, shutting down an emissions unit mid-process can cause equipment damage. Therefore, since it is not always possible to shut down a process with material remaining in the equipment, IDEM has revised the condition to state that in the case of baghouse failure, the feed to the process must be shut off immediately, and the process shall be shut down as soon as practicable.

D.2.65 Broken or Failed Bag Detection

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

- (a) ~~For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

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

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.2.76 Record Keeping Requirements

- ~~(c) To document compliance with Condition D.2.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

Conclusion and Recommendation

This proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 163-22258-00008. The staff recommends to the Commissioner that this Part 70 Significant Permit Modification be approved.