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Mr. William Parker
BWX Technologies, Inc.
1400 Old Highway 69 South
Mount Vernon, Indiana 47620

January 27, 2006

Re: 129-22377-00022
First Administrative Amendment to
FESOP F129-14948-00022

Dear Mr. Parker:

BWX Technologies, Inc submitted a letter requesting a deletion of One (1) Shot Blast Unit with an abrasive room. This Shot Blast Unit has been removed from the source, and the abrasive room has been demolished. The request was received December 9, 2005. Pursuant to the provisions of 326 IAC 2-8-10 (a)(6) the permit is hereby administratively amended as follows:

Page 3 of the Table of Contents, Section D.2 was revised and the paragraphs were renumbered:

SECTION D.2 FACILITY OPERATION CONDITIONS: Blasting and Welding Operations 30

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

- D.2.1 Particulate [326 IAC 6-3-2]
D.2.2 Particulate Matter (PM and PM10) [326 IAC 2-8-4] [326 IAC 2-2] [40 CFR 52.21]
D.2.3 2 Particulate Matter (PM and PM10) [326 IAC 2-8-4] [326 IAC 2-2] [40 CFR 52.21]
D.2.4 3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.2.5 Particulate Matter (PM)

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

- D.2.6 Visible Emissions Notations
D.2.7 Parametric Monitoring
D.2.8 Baghouse Inspections
D.2.9 Broken or Failed Bag Detection

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

- D.2.10 4 Record Keeping Requirements
D.2.11 5 Reporting Requirements

Section A.2(f) was revised to show the removal of the shot blast unit with the abrasive shot blast room, identified as SM 8293, being removed

- (f) ~~One (1) shot blast unit equipped with abrasive blast room, identified as SM 8293, equipped with either a 3/8-inch or 1/2-inch nozzle, operating at a nozzle pressure of 100 pounds per square inch gauge, equipped with a baghouse for particulate matter control and exhausting to Stack S09, capacity: 330 actual cubic feet per minute maximum air flow and a process throughput of 14,515 pounds per hour.~~ **One (1) shot blast unit, identified as SM 8293, has been removed and abrasive blast room building was demolished.**

Section D.2 was revised and deleted all references to SM 8293 shot blast unit. The conditions were renumbered accordingly:

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (f) ~~One (1) shot blast unit equipped with abrasive blast room, identified as SM 8293, equipped with either a 3/8-inch or 1/2-inch nozzle, operating at a nozzle pressure of 100 pounds per square inch gauge, equipped with a baghouse for particulate matter control and exhausting to Stack S09, capacity: 330 actual cubic feet per minute maximum air flow and a process throughput of 14,515 pounds per hour.~~ **One (1) shot blast unit, identified as SM 8293 was removed and abrasive blast room building was demolished in 2005.**
- (g) One (1) portable sand blast unit, identified as ME 1020, equipped with a 1/4-inch nozzle, operating at a nozzle pressure of 90 pounds per square inch gauge, capacity: 99 actual cubic feet per minute maximum compressed air flow and a process throughput of 13,559 pounds per hour.
- (h) Nine (9) submerged arc welding stations, capacity: 8 pounds of wire per station per hour.
- (i) Twenty (20) metal inert gas (MIG) welding stations, capacity: 5.5 pounds of wire per station per hour.
- (j) Twenty (20) stick welding stations, capacity: 10 pounds of wire per station per hour.
- (k) Sixteen (16) tungsten inert gas (TIG) welding stations, capacity: 1 pound of wire per station per hour.

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

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

D.2.1 Particulate [326 IAC 6-3-2]

- ~~(a) Pursuant to 326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies), the allowable particulate emission rate from the one (1) shot blast unit, identified as SM 8293, shall not exceed 15.5 pounds per hour when operating at a process weight rate of 7.26 tons per hour. The pounds per hour limitation was calculated using the following equation:~~

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

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

- (b) Pursuant to 326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies), the allowable particulate emission rate from the one (1) portable sand blast unit, identified as ME 1020, shall not exceed 14.8 pounds per hour when operating at a process weight rate of 6.78 tons per hour. The pounds per hour limitation was calculated using the following equation:

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

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

~~D.2.2 Particulate Matter (PM and PM₁₀) [326 IAC 2-8-4] [326 IAC 2-2] [40 CFR 52.21]~~

- (a) ~~The PM emissions from the one (1) shot blast unit equipped with abrasive blast room, identified as SM 8293, shall be limited to less than 43.53 pounds per hour, equivalent to 190.7 tons per year. Therefore, the requirements of 326 IAC 2-2 are not applicable.~~
- (b) ~~The PM₁₀ emissions from the one (1) shot blast unit equipped with abrasive blast room, identified as SM 8293, shall be limited to less than 11.67 pounds per hour, equivalent to 51.1 tons per year. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-2 are not applicable.~~

~~D.2.2 3 Particulate Matter (PM and PM₁₀) [326 IAC 2-8-4] [326 IAC 2-2] [40 CFR 52.21]~~

~~Pursuant to FESOP 129-5597-00022, the total welding consumables used at the nine (9) submerged arc welding stations, the twenty (20) metal inert gas (MIG) welding stations, the twenty (20) stick welding stations, and the sixteen (16) tungsten inert gas (TIG) welding stations shall not exceed 320 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, equivalent to PM and PM₁₀ emissions of 3.20 tons per year. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-2 are not applicable.~~

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

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the portable sand blast unit (ME 1020). ~~the shot blast unit (SM 8293) and its control device.~~~~

~~Compliance Determination Requirements~~

~~D.2.5 Particulate Matter (PM)~~

~~Pursuant to FESOP 129-5597-00022, issued on June 19, 1997, and in order to comply with Conditions D.2.1 and D.2.2, the baghouse for PM control shall be in operation and control emissions from the shot blast unit (SM 8293) at all times that the shot blast unit is in operation.~~

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

D.2.6 Visible Emissions Notations

- (a) ~~Visible emission notations of the shot blast unit (SM 8293) stack exhaust (Stack S09) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- (b) ~~For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- (c) ~~In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- (d) ~~A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- (e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

D.2.7 Parametric Monitoring

~~The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the shot blast unit (SM 8293), at least once per shift when the shot blast unit is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.25 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

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

D.2.8 Baghouse Inspections

~~An inspection shall be performed within the last month of each calendar quarter of all bags controlling the shot blast unit (SM 8293) when venting to the atmosphere. All defective bags shall be replaced.~~

D.2.9 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. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B – Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated.~~

- ~~For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~
- (b) ~~For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions)~~

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

D.2.4 10-Record Keeping Requirements

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records of the total welding consumables used at the nine (9) submerged arc welding stations, the twenty (20) metal inert gas (MIG) welding stations, the twenty (20) stick welding stations, and the sixteen (16) tungsten inert gas (TIG) welding stations.
- ~~(a) To document compliance with Condition D.2.6, the Permittee shall maintain records of visible emission notations of the shot blast unit (SM 8293) stack exhaust once per shift.~~
- ~~(b) To document compliance with Condition D.2.7, the Permittee shall maintain once per shift records of the total static pressure drop during normal operation.~~
- ~~(c) To document compliance with Condition D.2.8, the Permittee shall maintain records of the results of the inspections required under Condition D.2.8 and the dates the vents are redirected.~~
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.5 11-Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

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 Gary Freeman, at (800) 451-6027, press 0 and ask for Gary Freeman or extension (3-5334), or dial (317) 233-5334.

Sincerely,
Original signed by

Nysa L. James, Section Chief
Permits Review Section 1
Office of Air Quality

Attachments: Updated Pages

PD/gkf

cc: File –Posey County
Posey County Health Department
Air Compliance Section Inspector – Derrick Ohning
Billing, Licensing and Training Section - Chet Bohannon
Permit Review Section 1 - Gary Freeman
IDEM Southwest Regional Office



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

**BWX Technologies, Inc.
 1400 Old Highway 69 South
 Mount Vernon, Indiana 47620**

(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.

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

Operation Permit No.: F 129-14948-00022	
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 20, 2002 Expiration Date: November 20, 2007

First Administrative Amendment: 129-22377-00022	Pages Affected: 5 and Section D.2 revised and paragraphs renumbered
Original signed by: Nysa L. James, Section Chief Office of Air Quality	Issuance Date: January 27, 2006 Expiration Date: November 20, 2007



Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
[326 IAC 2-8-5(1)]

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

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-8-4, 5]

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4, 5]

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

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS: Significant Combustion Units..... 26

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

D.1.1 Fuel Usage Condition [326 IAC 2-8]

D.1.2 Particulate Limitation [326 IAC 6-2-3]

D.1.3 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 7-2-1]

D.1.4 Nitrogen Oxides (NO_x) and Carbon Monoxide (CO) [326 IAC 2-8-4] [326 IAC 2-2] [40 CFR
52.21]

Compliance Determination Requirements

D.1.5 Sulfur Dioxide Emissions and Sulfur Content

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

D.1.6 Visible Emissions Notations

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

D.1.7 Record Keeping Requirements

D.1.8 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS: Blasting and Welding Operations 30

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

D.2.1 Particulate [326 IAC 6-3-2]

D.2.2 Particulate Matter (PM and PM₁₀) [326 IAC 2-8-4] [326 IAC 2-2] [40 CFR 52.21]

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

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

D.2.4 Record Keeping Requirements

D.2.5 Reporting Requirements

SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary pressure vessel components, mine equipment and other large fabricated or machined components manufacturing source.

Authorized Individual:	Plant Manager
Source Address:	1400 Old Highway 69 South, Mount Vernon, Indiana 47620
Mailing Address:	1400 Old Highway 69 South, Mount Vernon, Indiana 47620
General Source Phone Number:	812 - 838 - 1088
SIC Code:	3443
County Location:	Posey
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) natural gas or No. 2 distillate oil-fired boiler, identified as SM 7567, constructed in 1963, exhausted through Stack S01, rated at 26.5 million British thermal units per hour.
- (b) One (1) natural gas-fired stress-relieving furnace, with car bottom, identified as SM 8252, exhausted through Stack S03, rated at 63 million British thermal units per hour, capacity: 750 tons per 48 hour run.
- (c) One (1) natural gas-fired plate heating furnace, with car bottom, identified as SM 8251, exhausted through Stack S04, rated at 74 million British thermal units per hour, capacity: 200 tons per 18 hour run.
- (d) One (1) natural gas-fired stress-relieving furnace, identified as SM 9425, exhausted through Stack S05, rated at 66 million British thermal units per hour, capacity: 320 tons per 30 hour run.
- (e) One (1) natural gas-fired stress-relieving furnace, with car bottom, identified as SM 7495, exhausted through Stack S06, rated at 61 million British thermal units per hour.
- (f) One (1) shot blast unit, identified as SM 8293, has been removed and the abrasive blast room building was demolished.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (f) One (1) shot blast unit, identified as SM 8293 was removed and abrasive blast room building was demolished in 2005.
- (g) One (1) portable sand blast unit, identified as ME 1020, equipped with a 1/4-inch nozzle, operating at a nozzle pressure of 90 pounds per square inch gauge, capacity: 99 actual cubic feet per minute maximum compressed air flow and a process throughput of 13,559 pounds per hour.
- (h) Nine (9) submerged arc welding stations, capacity: 8 pounds of wire per station per hour.
- (i) Twenty (20) metal inert gas (MIG) welding stations, capacity: 5.5 pounds of wire per station per hour.
- (j) Twenty (20) stick welding stations, capacity: 10 pounds of wire per station per hour.
- (k) Sixteen (16) tungsten inert gas (TIG) welding stations, capacity: 1 pound of wire per station per hour.

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

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

D.2.1 [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies), the allowable particulate emission rate from the one (1) portable sand blast unit, identified as ME 1020, shall not exceed 14.8 pounds per hour when operating at a process weight rate of 6.78 tons per hour. The pounds per hour limitation was calculated using the following equation:

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

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

D.2.2 Particulate Matter (PM and PM₁₀) [326 IAC 2-8-4] [326 IAC 2-2] [40 CFR 52.21]

Pursuant to FESOP 129-5597-00022, the total welding consumables used at the nine (9) submerged arc welding stations, the twenty (20) metal inert gas (MIG) welding stations, the twenty (20) stick welding stations, and the sixteen (16) tungsten inert gas (TIG) welding stations shall not exceed 320 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, equivalent to PM and PM₁₀ emissions of 3.20 tons per year. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-2 are not applicable.

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the portable sand blast unit (ME 1020).

- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.2.4 Record Keeping Requirements

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records of the total welding consumables used at the nine (9) submerged arc welding stations, the twenty (20) metal inert gas (MIG) welding stations, the twenty (20) stick welding stations, and the sixteen (16) tungsten inert gas (TIG) welding stations.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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BWX Technologies, Inc.
Mount Vernon, Indiana
Permit Reviewer: EAL/MES

First Administrative Amendment 129-22377
Amended by Gray Freeman

Page 33 of 43
OP No. F 129-14948-00022

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