INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: September 22, 2006

RE: Brinly-Hardy Company / 019-22736-00098

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 03/23/06

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Minor Source Operating Permit
OFFICE OF AIR QUALITY

Brinly – Hardy Company
3230 Industrial Parkway
Jeffersonville, Indiana 47130

(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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 019-22736-00098	
Issued by: Origin signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date:September 22, 2006 Expiration Date:September 22, 2011

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a lawn and garden equipment manufacturing facility.

Authorized Individual:	Jane W. Hardy, President and CEO
Source Address:	3230 Industrial Parkway, Jeffersonville, IN 47130
Mailing Address:	3230 Industrial Parkway, Jeffersonville, IN 47130
General Source Phone:	(812) 218-7216
SIC Code:	3524
County Location:	Clark
Source Location Status:	Nonattainment for 8-hour ozone and $PM_{2.5}$ Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD, Emission Offset and Nonattainment NSR; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) One (1) powder coating application booth, identified as PC-A, constructed in 1990, coating a maximum of 20,000 pounds of metal parts per hour, utilizing electrostatic air atomized spray guns and a combination dry filter and cyclone separator as particulate control, exhausting within the building.

(b) One (1) powder coating application booth, identified as PC-B, constructed in 1998, coating a maximum of 20,000 pounds of metal parts per hour, utilizing electrostatic air atomized spray guns and a combination dry filter and cyclone separator as particulate control, exhausting within the building.

(c) One (1) offset printing press identified as 8820 ABDick, constructed in 2000, with a maximum rate of rubber-base plus offset ink of 1.49 pounds per hour, unprinted paper of 79.85 pounds per hour, other liquids of 0.08 pounds per hour, with a maximum line speed of 8,464 feet per minute, a maximum print width of 11 inches, and exhausting through one (1) stack, identified as ID # 21.

(d) One (1) six stage conveyorized wash system, constructed in 1998, with a maximum throughput of 12.5 tons of metal parts per hour, exhausting at stacks 1 and 2.

(e) Six (6) robot MIG welding stations exhausting to stack 7 and consisting of:
- (1) One (1) station with a maximum capacity of 18.7 pounds of welding wire per hour;
- (2) Two (2) stations with a maximum capacity of 16 pounds of welding wire per hour;
- (3) One (1) station with a maximum capacity of 12.6 pounds of welding wire per hour; and
- (4) Two (2) stations with a maximum capacity of 26.6 pounds of welding wire per hour.

(f) Four (4) manual MIG welding stations with a maximum capacity of 26.6, 26.6, 26.6 and 18.7 pounds of welding wire per hour, exhausting at stack 8.

(g) Three (3) manual MIG welding stations with a maximum capacity of 11.3, 18.6 and 18.6 pounds of welding wire per hour, respectively, and exhausting fugitively within the building.

(h) Four (4) manual MIG welders utilized for research and development and are not production related equipment.

(i) Two (2) stick welders utilized in various areas of the plant for maintenance and tool die and are not production related equipment.

(j) Two (2) manual oxyacetylene cutting torches utilized for maintenance and tool die and are not production related equipment.

(k) One (1) tool and die bead blaster, identified as BB1, with a maximum capacity of 110 pounds of glass bead per hour, using a dust bag as particulate control, and exhausting within the building.

(l) Three (3) metal grinders, identified as MG1-3, with a maximum capacity of 100 pounds of metal die parts per hour, using a centrifugal dust collector as particulate control, and exhausting within the building.

(m) One (1) plow grinding and polishing operation, utilizing a dust collector for particulate matter control, and venting outside the building.

(n) One (1) natural gas fired boiler, with a rated heat input of 6 million British thermal units (MMBtu) per hour, constructed in 1998, and exhausting at stack 3.

(o) One (1) natural gas fired drying oven, with a rated heat input of 2.5 MMBtu per hour, exhausting at stack 4.

(p) One (1) natural gas fired curing oven, with a rated heat input of 5.5 MMBtu per hour, exhausting at stack 5 and 6.

(q) One (1) natural gas fired controlled pyrolysis cleaning furnace, rated at 0.95 MMBtu per hour, utilizing one (1) direct flame afterburner, rated at 0.56 MMBtu per hour as control and exhausting at stack 10.

(r) One (1) natural gas fired heat treating furnace, identified as tool and die heat treating furnace, rated at 0.078 MMBtu per hour, exhausting at stack 11.

(s) One (1) natural gas fired draw furnace, identified as tool and die draw furnace, rated at 0.18 MMBtu per hour, exhausting at stack 11.

(t) One (1) natural gas fired furnace/air make up unit, identified as blue furnace, rated at 4.4 MMBtu per hour, exhausting at stack 12.

(u) Two (2) natural gas fired furnaces each with a rated heat input of 0.115 MMBtu (0.230 MMBtu total), identified as S-13 and S-18.

(v) Two (2) natural gas fired furnaces each with a rated heat input of 0.110 MMBtu (0.220 MMBtu total), identified as S-14 and S-15.

(w) Three (3) natural gas fired furnaces each with a rated heat input of 0.110 MMBtu (0.330 MMBtu total), identified as S-16, S-17 and S-20.

(x) One (1) natural gas fired furnace with a rated heat input of 0.069 MMBtu, identified as S-19.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, 019-22736-00098, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

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

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

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

B.5 Severability

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

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

B.7 Duty to Provide Information

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

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

B.8 Certification

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

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

B.10 Preventive Maintenance Plan [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 upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to 019-22736-00098 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(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 ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

(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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and

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

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

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

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

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

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC13-17-3-2][IC 13-30-3-1]

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

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy,at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect,at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor,at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

(c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing.

(b) 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.19 Credible Evidence [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 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Fugitive Dust Emissions [326 IAC 6-4]

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

C.4 Stack Height [326 IAC 1-7]

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

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

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

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

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

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

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

All required notifications shall be submitted to:

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

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

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

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

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.7 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 2-6.1-5(a)(2)]

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.9 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.10 Instrument Specifications [326 IAC 2-1.1-11]

(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

C.11 Response to Excursions or Exceedances

(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.12 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

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

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 General Record Keeping Requirements[326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or LA initials makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or LA initials 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.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) 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

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) powder coating application booth, identified as PC-A, constructed in 1990, coating a maximum of 20,000 pounds of metal parts per hour, utilizing electrostatic air atomized spray guns and a combination dry filter and cyclone separator as particulate control, exhausting within the building.

(b) One (1) powder coating application booth, identified as PC-B, constructed in 1998, coating a maximum of 20,000 pounds of metal parts per hour, utilizing electrostatic air atomized spray guns and a combination dry filter and cyclone separator as particulate control, exhausting within the building.

(c) One (1) offset printing press identified as 8820 ABDick, constructed in 2000, with a maximum rate of rubber-base plus offset ink of 1.49 pounds per hour, unprinted paper of 79.85 pounds per hour, other liquids of 0.08 pounds per hour, with a maximum line speed of 8,464 feet per minute, a maximum print width of 11 inches, and exhausting through one (1) stack, identified as ID # 21.

(d) One (1) six stage conveyorized wash system, constructed in 1998, with a maximum throughput of 12.5 tons of metal parts per hour, exhausting at stacks 1 and 2.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

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

Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the surface coating operations (PC-A and PC-B) shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air.

Compliance Determination Requirements

D.1.2 Particulate Matter (PM)

The dry filters and cyclone separators for PM control shall be in operation at all times when the two (2) powder coating booths (PC-A and PC-B) are in operation.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(e) Six (6) robot MIG welding stations exhausting to stack 7 and consisting of:
- (1) One (1) station with a maximum capacity of 18.7 pounds of welding wire per hour;
- (2) Two (2) stations with a maximum capacity of 16 pounds of welding wire per hour;
- (3) One (1) station with a maximum capacity of 12.6 pounds of welding wire per hour; and
- (4) Two (2) stations with a maximum capacity of 26.6 pounds of welding wire per hour.

(f) Four (4) manual MIG welding stations with a maximum capacity of 26.6, 26.6, 26.6 and 18.7 pounds of welding wire per hour, exhausting at stack 8.

(g) Three (3) manual MIG welding stations with a maximum capacity of 11.3, 18.6 and 18.6 pounds of welding wire per hour, respectively, and exhausting fugitively within the building.

(h) Four (4) manual MIG welders utilized for research and development and are not production related equipment.

(i) Two (2) stick welders utilized in various areas of the plant for maintenance and tool die and are not production related equipment.

(j) Two (2) manual oxyacetylene cutting torches utilized for maintenance and tool die and are not production related equipment.

(k) One (1) tool and die bead blaster, identified as BB1, with a maximum capacity of 110 pounds of glass bead per hour, using a dust bag as particulate control, and exhausting within the building.

(l) Three (3) metal grinders, identified as MG1-3, with a maximum capacity of 100 pounds of metal die parts per hour, using a centrifugal dust collector as particulate control, and exhausting within the building.

(m) One (1) plow grinding and polishing operation, utilizing a dust collector for particulate matter control, and venting outside the building.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]

(a) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from one (1) tool and die bead blaster, identified as BB1, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air.

(b) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the three (3) metal grinders, identified as MG1 - MG3, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air.

(c) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the six (6) robot MIG welding stations, exhausting to stack 7, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air.

(d) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the four (4) manual MIG welding stations, exhausting to stack 8, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air.

(e) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the plow grinding and polishing operation, exhausting to stack 8, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air.

(f) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the three (3) manual MIG welders, four (4) R & D manual MIG welders, two (2) stick welders used only for maintenance, and two (2) manual cutting torches used only for maintenance, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air.

Compliance Determination Requirements

D.2.2 Particulate Matter (PM)

(a) In order to comply with Condition D.2.1(a), the dust bag shall be in operation at all times the tool and die bead blaster (BB1) is in operation.

(b) In order to comply with Condition D.2.1(b), the centrifugal dust collector shall be in operation at all times the metal grinders (MG1 – MG3) are in operation.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(n) One (1) natural gas fired boiler, with a rated heat input of 6 million British thermal units (MMBtu) per hour, constructed in 1998, and exhausting at stack 3.

(o) One (1) natural gas fired drying oven, with a rated heat input of 2.5 MMBtu per hour, exhausting at stack 4.

(p) One (1) natural gas fired curing oven, with a rated heat input of 5.5 MMBtu per hour, exhausting at stack 5 and 6.

(q) One (1) natural gas fired controlled pyrolysis cleaning furnace, rated at 0.95 MMBtu per hour, utilizing one (1) direct flame afterburner, rated at 0.56 MMBtu per hour as control and exhausting at stack 10.

(r) One (1) natural gas fired heat treating furnace, identified as tool and die heat treating furnace, rated at 0.078 MMBtu per hour, exhausting at stack 11.

(s) One (1) natural gas fired draw furnace, identified as tool and die draw furnace, rated at 0.18 MMBtu per hour, exhausting at stack 11.

(t) One (1) natural gas fired furnace/air make up unit, identified as blue furnace, rated at 4.4 MMBtu per hour, exhausting at stack 12.

(u) Two (2) natural gas fired furnaces each with a rated heat input of 0.115 MMBtu (0.230 MMBtu total), identified as S-13 and S-18.

(v) Two (2) natural gas fired furnaces each with a rated heat input of 0.110 MMBtu (0.220 MMBtu total), identified as S-14 and S-15.

(w) Three (3) natural gas fired furnaces each with a rated heat input of 0.110 MMBtu (0.330 MMBtu total), identified as S-16, S-17 and S-20.

(x) One (1) natural gas fired furnace with a rated heat input of 0.069 MMBtu, identified as S-19.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.3.1 Particulate Emission Limitations [326 IAC 6.5-1-2]

(a) Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter emissions from one (1) natural gas fired boiler rated at 6.0 MMBtu/hr shall not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf).

(b) Pursuant to 326 IAC 6.5-1-2(b)(3), the one (1) 6.0 MMBtu/hr boiler shall burn natural gas only.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Brinly – Hardy Company**
Address:	**3230 Industrial Parkway, Jeffersonville, IN 47130**
City:	**Jeffersonville**
Phone #:	**(812) 218-7216**
MSOP #:	**MSOP 019-22736-00098**

I hereby certify that Brinly – Hardy Company is
☐ still in operation.
☐ no longer in operation.

I hereby certify that Brinly – Hardy Company is
☐ in compliance with the requirements of MSOP 019-22736-00098.
☐ not in compliance with the requirements of MSOP 019-22736-00098.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMI LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:
_____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

Please note - This form should only be used to report malfunctions

applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____
_____

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for Minor Source Operating Permit Renewal

Source Name:	Brinly – Hardy Company
Source Location:	3230 Industrial Parkway, Jeffersonville, IN 47130
County:	Clark
SIC Code:	3524
Operation Permit No.:	019-13772-00098
Operation Permit Issuance Date:	May 15, 2001
Permit Renewal No.:	019-22736-00098
Permit Reviewer:	Adeel Yousuf/EVP

On July 28, 2006, the Office of Air Quality (OAQ) had a notice published in the Evening News, Jeffersonville, Indiana, stating that Brinly – Hardy Company had applied for a Minor Source Operating Permit (MSOP) renewal to operate a garden equipment manufacturing facility. 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.

No written comments were received during the public notice period, however, upon further review IDEM, OAQ has made the following changes to the MSOP (additions in bold, deletions in ~~strikeout~~):

1. Based on the inspection of the facility, IDEM, OAQ has determined that the powder coating application booths (PC-A and PC-B) at the source are not conventional spray booths. Material collected in the cyclone is recycled back to the coating system. Exhaust from the system goes into the paint room with no exhaust to the atmosphere. Therefore, it is not required to have compliance monitoring for the powder coating application booths (PC-A and PC-B). Conditions D.1.3, D.1.4 and D.1.5 have been removed from the permit to reflect this change.

~~D.1.3 Monitoring~~

~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation and when exhausting to the atmosphere. 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 of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground when exhausting to the atmosphere. 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.~~

~~D.1.4 Cyclone Failure Detection~~

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

~~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). 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 2-6.1-5(a)(2)]~~

~~D.1.5 Record Keeping Requirements~~

~~(a) To document compliance with Condition D.1.3, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.~~

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

2. On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule. Therefore, the following change will be made to the Technical Support Document "County Attainment Status" Section (**bolded** language has been added, the language with a ~~line~~ through it has been deleted). The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

County Attainment Status

The source is located in Clark County.

Pollutant	Status
PM2.5	Non-Attainment
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
~~1-hour Ozone~~	~~Attainment~~
8-hour Ozone	Non-Attainment
CO	Attainment
Lead	Attainment

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	Brinly – Hardy Company
Source Location:	3230 Industrial Parkway, Jeffersonville, IN 47130
County:	Clark
SIC Code:	3524
Operation Permit No.:	019-13772-00098
Operation Permit Issuance Date:	May 15, 2001
Permit Renewal No.:	019-22736-00098
Permit Reviewer:	Adeel Yousuf/EVP

The Office of Air Quality (OAQ) has reviewed an application from Brinly – Hardy Company relating to the operation of a lawn and garden equipment manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) powder coating application booth, identified as PC-A, constructed in 1990, coating a maximum of 20,000 pounds of metal parts per hour, utilizing electrostatic air atomized spray guns and a combination dry filter and cyclone separator as particulate control, exhausting within the building.

(b) One (1) powder coating application booth, identified as PC-B, constructed in 1998, coating a maximum of 20,000 pounds of metal parts per hour, utilizing electrostatic air atomized spray guns and a combination dry filter and cyclone separator as particulate control, exhausting within the building.

(c) One (1) offset printing press identified as 8820 ABDick, constructed in 2003, with a maximum rate of rubber-base plus offset ink of 1.49 pounds per hour, unprinted paper of 79.85 pounds per hour, other liquids of 0.08 pounds per hour, with a maximum line speed of 8,464 feet per minute, a maximum print width of 11 inches, and exhausting through one (1) stack, identified as ID # 21.

(d) One (1) six stage conveyorized wash system, constructed in 1998, with a maximum throughput of 12.5 tons of metal parts per hour, exhausting at stacks 1 and 2.

(e) Six (6) robot MIG welding stations exhausting to stack 7 and consisting of:
- (1) One (1) station with a maximum capacity of 18.7 pounds of welding wire per hour;
- (2) Two (2) stations with a maximum capacity of 16 pounds of welding wire per hour;
- (3) One (1) station with a maximum capacity of 12.6 pounds of welding wire per hour; and
- (4) Two (2) stations with a maximum capacity of 26.6 pounds of welding wire per hour.

(f) Four (4) manual MIG welding stations with a maximum capacity of 26.6, 26.6, 26.6 and 18.7 pounds of welding wire per hour, exhausting at stack 8.

(g) Three (3) manual MIG welding stations with a maximum capacity of 11.3, 18.6 and 18.6 pounds of welding wire per hour, respectively, and exhausting fugitively within the building.

(h) Four (4) manual MIG welders utilized for research and development and are not production related equipment.

(i) Two (2) stick welders utilized in various areas of the plant for maintenance and tool die and are not production related equipment.

(j) Two (2) manual oxyacetylene cutting torches utilized for maintenance and tool die and are not production related equipment.

(k) One (1) tool and die bead blaster, identified as BB1, with a maximum capacity of 110 pounds of glass bead per hour, using a dust bag as particulate control, and exhausting within the building.

(l) Three (3) metal grinders, identified as MG1-3, with a maximum capacity of 100 pounds of metal die parts per hour, using a centrifugal dust collector as particulate control, and exhausting within the building.

(m) One (1) plow grinding and polishing operation, utilizing a dust collector for particulate matter control, and venting outside the building.

(n) One (1) natural gas fired boiler, with a rated heat input of 6 million British thermal units (MMBtu) per hour, constructed in 1998, and exhausting at stack 3.

(o) One (1) natural gas fired drying oven, with a rated heat input of 2.5 MMBtu per hour, exhausting at stack 4.

(p) One (1) natural gas fired curing oven, with a rated heat input of 5.5 MMBtu per hour, exhausting at stack 5 and 6.

(q) One (1) natural gas fired controlled pyrolysis cleaning furnace, rated at 0.95 MMBtu per hour, utilizing one (1) direct flame afterburner, rated at 0.56 MMBtu per hour as control and exhausting at stack 10.

(r) One (1) natural gas fired heat treating furnace, identified as tool and die heat treating furnace, rated at 0.078 MMBtu per hour, exhausting at stack 11.

(s) One (1) natural gas fired draw furnace, identified as tool and die draw furnace, rated at 0.18 MMBtu per hour, exhausting at stack 11.

(t) One (1) natural gas fired furnace/air make up unit, identified as blue furnace, rated at 4.4 MMBtu per hour, exhausting at stack 12.

(u) Two (2) natural gas fired furnaces each with a rated heat input of 0.115 MMBtu (0.230 MMBtu total), identified as S-13 and S-18.

(v) Two (2) natural gas fired furnaces each with a rated heat input of 0.110 MMBtu (0.220 MMBtu total), identified as S-14 and S-15.

(w) Three (3) natural gas fired furnaces each with a rated heat input of 0.110 MMBtu (0.330 MMBtu total), identified as S-16, S-17 and S-20.

(x) One (1) natural gas fired furnace with a rated heat input of 0.069 MMBtu, identified as S-19.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Permitted Emission Units and Pollution Control Equipment Removed from the Source

The source also consists of the following previously permitted emission units and pollution control devices that have been removed from service and are not included in this renewal review:

(a) One (1) offset printing press identified as 1850, with a maximum rate of rubber-base plus offset ink of 1.49 pounds per hour, unprinted paper of 159.71 pounds per hour, other liquids of 0.26 pounds per hour, with a maximum line speed of 24,888, a maximum print width of 17 inches, respectively, and exhausting through one (1) stack, identified as ID # 21.
Note: One (1) printing press identified as 1250 (with emissions below exemption level) permitted in the original MSOP has been replaced with a similar type and size offset printing press identified as 8820 ABDick (with emissions below exemption level) listed above under "Permitted Emission Units and Pollution Control Equipment" section of this document.

Existing Approvals

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

(a) Minor Source Operating Permit No.: 019-13772-00098 issued on May 15, 2001.

All conditions from previous approvals were incorporated into this permit.

Air Pollution Control Justification as an Integral Part of the Process

Brinly – Hardy Company has submitted the following justification such that the combination dry filter and cyclone separator be considered as an integral part of the two (2) powder coating application booths (PC-A and PC-B):

(a) The collection and recycling equipment is interlocked into the control system of the powder coating booth and will prevent if from operating if the collection and recycling equipment is not functioning.

(b) The operation of the collection and recycling equipment results in an overwhelming positive net economic effect because it enables us to recycle previously sprayed powder coating that did not adhere to the parts being coated. This results in at least a 90% decrease in powder use over what it would be if there were no collection and recycling equipment operating. The savings associated with the decrease in powder coating use far outweighs the cost of the installation, operation and maintenance of the equipment.

IDEM, OAQ has evaluated the justifications and agreed that the combination dry filter and cyclone separator will be considered as an integral part of the two (2) powder coating application booths (PC-A and PC-B). Therefore, the permitting level will be determined using the potential to emit after the combination dry filter and cyclone separator. Operating conditions in the proposed permit will specify that this combination dry filter and cyclone separator shall operate at all times when the two (2) powder coating application booths (PC-A and PC-B) are in operation.

Enforcement Issue

IDEM is aware that the source did not apply for a MSOP renewal in a timely manner. IDEM is reviewing this matter and will take appropriate action.

Recommendation

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

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

An application for the purposes of this review was received on May 6, 2006, with additional information received on June 9, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 8)

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	79.48
PM-10	80.01
SO_2	0.06
VOC	0.73
CO	7.73
NO_x	9.21

HAPs	Potential to Emit (tons/yr)
Manganese	0.40
Hexane	0.17
Total	0.57

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 is greater than 25 tons per year and less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

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

County Attainment Status

The source is located in Clark County.

Pollutant	Status
PM2.5	Non-Attainment
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Non-Attainment
CO	Attainment
Lead	Attainment

(a) Clark County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements.

(b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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. Clark 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.

(c) Clark 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.

Source Status

Existing Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	63.18
PM-10	63.71
SO_2	0.06
VOC	0.73
CO	7.73
NO_x	9.21
Single HAP	0.40
Combination HAPs	0.57

(a) This existing source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2 and 2-3, the PSD and Emission Offset requirements do not apply.

(b) These emissions are based on the MSOP renewal application submitted by the source.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit MSOP Renewal 019-22736-00098, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

(a) The requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) are not included in the permit for one (1) natural gas fired boiler with a maximum heat input capacity of 6.0 MMBtu per hour because the boiler's capacity is less than the rule applicability threshold of 10 MMBtu per hour.

(b) One (1) printing press identified as 8820 ABDick is a nonheatset, sheet-fed, offset lithographic printing press, and not a rotogravure printing press. Therefore, the requirements of 40 CFR 60, Subpart QQ, Standards of Performance for the Graphics Arts Industry: Publication Rotogravure Printing, are not included in the permit.

(c) One (1) printing press identified as 8820 ABDick is not a rotogravure printing line. Therefore, the requirements of 40 CFR 60, Subpart FFF, Standards of Performance for Flexible Vinyl and Urethane Coating and Printing, are not included in the permit.

(d) One (1) printing press identified as 8820 ABDick is not a rotogravure, product and packaging rotogravure, or wide-web flexographic printing press. Therefore, the requirements of 40 CFR 63, Subpart KK, National Emission Standards for the Printing and Publishing Industry, are not included in the permit.

(e) One (1) printing press identified as 8820 ABDick performs lithographic web printing. Therefore, the requirements of 40 CFR 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating, are not included in the permit.

(f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T are not included in the permit for one (1) six stage converized metal parts cleaner because no halogenated solvents are used.

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants for surface coating of miscellaneous metal parts and products (40 CFR Part 63.3880, Subpart MMMM) is not included in the permit because there are no HAP emissions from coating booths PC-A and PC-B.

State Rule Applicability – Entire Source

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

Pursuant to 326 IAC 2-2 (PSD), this existing minor source, originally constructed in 1999 after the August 7, 1977 rule applicability date, is still not considered a major source. This source is not one of the 28 listed source categories, it does not have the potential to emit of 250 tons per year (tpy) or more of any criteria non-fugitive pollutant and the fugitive PM and PM-10 emissions are not counted toward determination of PSD applicability since there are no applicable New Source Performance Standards that were in effect on August 7, 1980. Therefore, 326 IAC 2-2 does not apply.

326 IAC 2-3 (Emission Offset)

Clark County has been designated as nonattaiment for the 8-hour ozone standard. However, since the potential to emit of VOC and NOx, are each less than 100 tons per year, this source is a minor source under 326 IAC 2-3, Emission Offset.

326 IAC 2-1.1-5 (Nonattainment NSR)

This source is located in Clark County, which has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. The potential PM10 emissions are less than 100 tons/yr. Therefore, this existing source is a Nonattainment NSR minor source.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

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

Pursuant to 326 IAC 2-4.1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of any combination of HAPs, must be controlled using technologies consistent with Maximum Ach ievable Control Technology (MACT). The source has unlimited potential to emit of single HAP and combination of HAPs of less than 10 tons per year and 25 tons per year, respectively. Therefore 326 IAC 2-4.1-1 is not applicable to the source.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is not subject to 326 IAC 6-5, for fugitive particulate matter emissions, because the fugitive particulate matter emissions from this source are less than 25 tons per year.

State Rule Applicability – Individual Facilities

326 IAC 6.5-1-2 (Particulate Emission Limitations)

Pursuant to 326 IAC 6.5-1-2 (Applicability), specifically listed sources or facilities, or sources or facilities not specifically listed but located in a listed county and having either a potential to emit (PTE) one hundred (100) tons per year (tpy) or more or actual emissions of ten (10) tpy or more of particulate matter (PM), are subject to the applicable limitation(s) of this rule.

This source is located in Clark County, which is listed in 326 IAC 6.5-4-1. However, the source is not specifically listed in 326 IAC 6.5-2-1. This notwithstanding, since actual PM emissions from the source is greater than 10 tons per year, the requirements of 326 IAC 6.5-1-2 are applicable as discussed below:

(a) Pursuant to 326 IAC 6.5-1-2(b)(3), particulate matter emissions from one (1) natural gas fired boiler rated at 6.0 MMBtu/hr shall not exceed one-hundredth (0.01) grain per dry standard cubic foot (dscf).

(b) Pursuant to 326 IAC 6.5-1-2(b), twelve (12) natural gas fired furnaces are not subject to the requirements of this rule since the furnace does not qualify as a steam generating unit and there are no other particulate emissions from the furnaces.

(c) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from each of the powder coating booths (PC-A and PC-B) shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air.

The dry filters and cyclone separator shall be in operation at all times that the powder coating booths (PC-A and PC-B) are in operation, in order to comply with this limit.

(d) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the one (1) tool and die bead blaster, identified as BB1, shall not exceed 0.03 to three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air.

The dust bag shall be in operation at all times the tool and die bead blaster is in operation, in order to comply with this limit.

(e) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the three (3) metal grinders, identified as MG1 - MG3, shall not exceed 0.03 to three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air.

The centrifugal dust collector shall be in operation at all times the metal grinder (MG1 – MG3) is in operation, in order to comply with this limit.

(f) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the six (6) robot MIG welding stations, exhausting to stack 7, shall not exceed 0.03 to three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air.

(g) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the four (4) manual MIG welding stations, exhausting to stack 8, shall not exceed 0.03 to three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air.

(h) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the plow grinding and polishing operation, exhausting to stack 8, shall not exceed 0.03 to three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air.

(i) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the three (3) manual MIG welders, four (4) R & D manual MIG welders, two (2) stick welders used only for maintenance, and two (2) manual cutting torches used only for maintenance, shall not exceed 0.03 to three-hundredths (0.03) grain per dry standard cubic foot (gr/dscf) of exhaust air.

Based on the information provided by the Permittee, each emission unit listed above will comply with the grain loading requirement of 0.03 gr/dscf.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The manufacturing processes at this source are subject to the requirements of 326 IAC 6.5-1-2, as discussed above. The requirements of 326 IAC 6-3-2 are not applicable because the limits pursuant to 326 IAC 6.5-1-2 are more stringent.

326 IAC 8-1-6 (New Facilities - General Reduction Requirement)
This source does not have potential VOC emissions equal to or greater than twenty five (25) tons per year, therefore this source is not subject to the provisions of 326 IAC 8-1-6.

326 IAC 8-2-9 (Miscellaneous Metal Coating)
Powder coating operations (PC-A and PC-B) are not subject to the requirements of 326 IAC 8-2-9 since no VOCs are emitted.

326 IAC 8-3-1 (Organic Solvent Degreasing Operations)
The six (6) stage conveyorized wash system is an aqueous wash system and does not contain or emit Volatile Organic Compounds, therefore the requirements of 326 IAC 8-3-4 and 8-3-7 do not apply to this operation.

326 IAC 8-5-5 (Graphic Arts Operations)
The one (1) printing presses, identified as 8820 ABDick, are not subject to the requirements of 326 IAC 8-5-5, because the printing press does not involve packaging rotogravure, publication rotogravure or flexographic printing.

326 IAC 8-6 (Organic Solvent Emission Limitations)
This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source does not have potential VOC emissions at, or in excess of 100 tons per year; therefore, this rule does not apply.

326 IAC 8-7 (Specific VOC reduction Requirements for Lake, Porter, Clark, and Floyd Counties)
This source is not subject to the requirements of 326 IAC 8-7, since total potential VOC emissions from all affected facilities are below 25 tons per year and potential VOC emissions from affected coating facilities are below 10 tons per year.

Compliance Requirements

Permits issued under 326 IAC 2-6 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-6.1-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

1. The powder coating application booths (PC-A and PC-B) have applicable compliance monitoring conditions as specified below:

   (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation and when exhausting to the atmosphere. 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 of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground when exhausting to the atmosphere. 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) In the event that cyclone failure has been observed:

   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). Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

   These monitoring conditions are necessary because the dry filters and cyclones for powder coating application booths (PC-A and PC-B) must operate properly to ensure compliance with 326 IAC 6.5-1-2 (Particulate Emission Limitations).

Conclusion

The operation of this lawn and garden equipment manufacturing facility shall be subject to the conditions of the Minor Source Operating Permit Renewal 019-22736-00098.

Appendix A: Emission Calculations Summary

Company Name: Brinly-Hardy Company
Address City IN Zip: 3230 Industrial Parkway, Jeffersonville, IN 47130
Permit No.: 019-22736
Plt ID: 019-00098
Reviewer: AY/EVP

Uncontrolled Potential Emissions (tons/year)

	Emissions Generating Activity						
Pollutant	Powder Coating Operation	Welding	Tool & Die Bead Blaster	Metal Die Part Grinding & Polishing	Printing Press Operations	Natural Gas Combustion	**TOTAL**
PM	52.53	6.78	18.40	1.60	0.00	0.17	79.48
PM10	52.53	6.78	18.40	1.60	0.00	0.70	80.01
SO2	0.00	0.00	0.00	0.00	0.00	0.06	0.06
NOx	0.00	0.00	0.00	0.00	0.00	9.21	9.21
VOC	0.00	0.00	0.00	0.00	0.22	0.51	0.73
CO	0.00	0.00	0.00	0.00	0.00	7.73	7.73
total HAPs	0.00	0.40	0.00	0.00	0.00	0.17	0.57
worst case single HAP	0.00	0.40	0.00	0.00	0.00	0.165 (Hexane)	0.40

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

Controlled Potential Emissions (tons/year)

	Emissions Generating Activity						
Pollutant	Powder Coating Operation	Welding	Tool & Die Bead Blaster	Metal Die Part Grinding	Printing Press Operations	Natural Gas Combustion	**TOTAL**
PM	52.53	6.78	3.68	0.02	0.00	0.17	63.18
PM10	52.53	6.78	3.68	0.02	0.00	0.70	63.71
SO2	0.00	0.00	0.00	0.00	0.00	0.06	0.06
NOx	0.00	0.00	0.00	0.00	0.00	9.21	9.21
VOC	0.00	0.00	0.00	0.00	0.22	0.51	0.73
CO	0.00	0.00	0.00	0.00	0.00	7.73	7.73
total HAPs	0.00	0.40	0.00	0.00	0.00	0.17	0.57
worst case single HAP	0.00	0.40	0.00	0.00	0.00	0.165 (Hexane)	0.40

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

Appendix A: Emissions Calculations
VOC and Particulate
From Powder Coating Operations

Company Name: Brinly-Hardy Company
Address City IN Zip: 3230 Industrial Parkway, Jeffersonville, IN 47130
Permit No.: 019-22736
Plt ID: 019-00098
Reviewer: AY/EVP

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Booth A																
30-6066 Corvel Green	10.43	1.00%	1.0%	0.0%	0.0%	99.00%	0.00460	20000.000	0.00	0.00	0.00	0.00	0.00	1040.21	0.00	75%
30-6142 Corvel AG Green	10.51	1.00%	1.0%	0.0%	0.0%	99.00%	0.00450	20000.000	0.00	0.00	0.00	0.00	0.00	1025.40	0.00	75%
30-7121 Corvel Bright Green ACII	11.52	1.00%	1.0%	0.0%	0.0%	99.00%	0.00410	20000.000	0.00	0.00	0.00	0.00	0.00	1024.04	0.00	75%
30-7121 Corvel Black	11.6	1.00%	1.0%	0.0%	0.0%	99.00%	0.00410	20000.000	0.00	0.00	0.00	0.00	0.00	1031.15	0.00	75%
State Potential Emissions			**Add worst case coating to all solvents**								**0.00**	**0.00**	**0.00**	**1040.21**		

Controlled Potential Emissions

	Control Efficiency PM	Controlled PM tons/yr
Total Controlled Potential Emissions:	99.95%	**0.52**

Note: Control equipment is considered an integral part of the process.

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Booth B																
30-6066 Corvel Green	10.43	1.00%	1.0%	0.0%	0.0%	99.00%	0.00460	20000.000	0.00	0.00	0.00	0.00	0.00	1040.21	0.00	75%
30-6142 Corvel AG Green	10.51	1.00%	1.0%	0.0%	0.0%	99.00%	0.00450	20000.000	0.00	0.00	0.00	0.00	0.00	1025.40	0.00	75%
30-7121 Corvel Bright Green ACII	11.52	1.00%	1.0%	0.0%	0.0%	99.00%	0.00410	20000.000	0.00	0.00	0.00	0.00	0.00	1024.04	0.00	75%
30-7121 Corvel Black	11.6	1.00%	1.0%	0.0%	0.0%	99.00%	0.00410	20000.000	0.00	0.00	0.00	0.00	0.00	1031.15	0.00	75%
State Potential Emissions			**Add worst case coating to all solvents**								**0.00**	**0.00**	**0.00**	**1040.21**		

Controlled Potential Emissions

	Control Efficiency PM	Controlled PM tons/yr
Total Controlled Potential Emissions:	95.00%	**52.01**

Note: Control equipment is considered an integral part of the process.

Note: Coating in Booth A and Booth B are mutually exclusive

METHODOLOGY

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

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Brinly-Hardy Company
Address City IN Zip: 3230 Industrial Parkway, Jeffersonville, IN 47130
Permit No.: 019-22736
Plt ID: 019-00098
Reviewer: AY/EVP

THROUGHPUT

Press I.D.	MAXIMUM LINE SPEED (FEET/MIN	MAXIMUM PRINT WIDTH (INCHES	MMin^2/YEAR
8820 ABDick	122	11	8,464

INK VOCS

Ink Name Press Id	Maximum Coverage '(lbs/MMin^2)	Weight % Volatiles	Flash Off %	Throughput (MMin^2/Year)	Emissions* (TONS/YEAR)
Rubber-Base Plus Offset Ink	1.54206	0%	80.00%	8464	0.00
Economist Anti-Oxidant For Ink	0.08280	80%	80.00%	8464	0.22

Total VOC Emissions =	**0.22 Ton/yr**

*VOC (Tons/Year) = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput * 1 Ton per 2000 pounds

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year
NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emission Calculations
Tool and Die Bead Blaster

Company Name: Brinly-Hardy Company
Address City IN Zip: 3230 Industrial Parkway, Jeffersonville, IN 47130
Permit No.: 019-22736
Plt ID: 019-00098
Reviewer: AY/EVP

Table 1 - Emission Factors for Abrasives

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

Table 2 - Density of Abrasives (lb/ft3)

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

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

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

	Nozzle Pressure (psig)							
Internal diameter, in	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)	
FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =	420
D = Density of abrasive (lb/ft3) From Table 2 =	99
D1 = Density of sand (lb/ft3) =	99
ID = Actual nozzle internal diameter (in) =	0.312
ID1 = Nozzle internal diameter (in) from Table 3 =	0.312

Flow Rate (FR) (lb/hr) = **420.000** per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =	0.010
FR = Flow Rate (lb/hr) =	420.000
w = fraction of time of wet blasting =	0 %
N = number of nozzles =	1

Uncontrolled Emissions =	**4.20 lb/hr**
	18.40 ton/yr

Controlled Emissions =	**0.84 lb/hr**
	3.68 ton/yr

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)
Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs
Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1)
E = EF x FR x (1-w/200) x N
w should be entered in as a whole number (if w is 50%, enter 50)
*Utilizing Dust Bag with 80% control efficiency

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Brinly-Hardy Company
Address City IN Zip: 3230 Industrial Parkway, Jeffersonville, IN 47130
Permit No.: 019-22736
Plt ID: 019-00098
Reviewer: AY/EVP

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
21.017	184.1

Facilities	MMBtu/hr
Boiler	6
Drying Oven	2.5
Curing Oven	5.5
Controlled Pyrolysis Cleaning Furnace	0.95
Afterburner on controlled pyrolysis furnace	0.56
Heat Treating Furnace	0.078
Draw Furnace	0.18
Furnace/air make up unit	4.4
Two (2) furnaces (0.115 MMBtu/hr each)	0.23
Two (2) furnaces (0.110 MMBtu/hr each)	0.22
Three (3) furnaces (0.110 MMBtu/hr each)	0.33
Furnace	0.069
Total	**21.017**

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.17	0.70	0.06	9.21	0.51	7.73

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

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See next page for HAPs emissions calculations.

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

Company Name: Brinly-Hardy Company
Address City IN Zip: 3230 Industrial Parkway, Jeffersonville, IN 47130
Permit No.: 019-22736
Plt ID: 019-00098
Reviewer: AY/EVP

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.933E-04	1.105E-04	6.904E-03	1.657E-01	3.130E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	4.603E-05	1.013E-04	1.289E-04	3.498E-05	1.933E-04

Methodology is the same as previous page.

1.737E-01

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

Appendix A: Welding and Thermal Cutting

Company Name: Brinly-Hardy Company
Address City IN Zip: 3230 Industrial Parkway, Jeffersonville, IN 47130
MSOP: 019-13772
Plt ID: 019-00098
Reviewer: AY/EVP

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
WELDING Stack 7				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Metal Inert Gas (MIG)(E70S-3)	1	12.6		0.0051	0.0003	--	--	0.064	0.00378	0.000	0.000	0.004
Metal Inert Gas (MIG)(E70S-3)	1	26.6		0.0051	0.0003	--	--	0.136	0.00798	0.000	0.000	0.008
Metal Inert Gas (MIG)(E70S-3)	1	16		0.0051	0.0003	--	--	0.082	0.0048	0.000	0.000	0.005
Metal Inert Gas (MIG)(E70S-3)	1	26.6		0.0051	0.0003	--	--	0.136	0.00798	0.000	0.000	0.008
Metal Inert Gas (MIG)(E70S-3)	1	16		0.0051	0.0003	--	--	0.082	0.0048	0.000	0.000	0.005
Metal Inert Gas (MIG)(E70S-3)	1	18.7		0.0051	0.0003	--	--	0.095	0.00561	0.000	0.000	0.006

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
WELDING Stack 8				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Metal Inert Gas (MIG)(E70S-3)	1	26.6		0.0051	0.0003	--	--	0.136	0.00798	0.000	0.000	0.008
Metal Inert Gas (MIG)(E70S-3)	1	26.6		0.0051	0.0003	--	--	0.136	0.00798	0.000	0.000	0.008
Metal Inert Gas (MIG)(E70S-3)	1	26.6		0.0051	0.0003	--	--	0.136	0.00798	0.000	0.000	0.008
Metal Inert Gas (MIG)(E70S-3)	1	18.7		0.0051	0.0003	--	--	0.095	0.00561	0.000	0.000	0.006

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Metal Inert Gas (MIG)(E70S-3)	1	11.3		0.0051	0.0003	--	--	0.058	0.00339	0.000	0.000	0.003
Metal Inert Gas (MIG)(E70S-3)	1	18.6		0.0051	0.0003	--	--	0.095	0.00558	0.000	0.000	0.006
Manual Metal Inert Gas (MIG)(E70	2	18.6		0.0051	0.0003	--	--	0.190	0.01116	0.000	0.000	0.011
Manual Metal Inert Gas (MIG)(E70	1	18.6		0.0051	0.0003	--	--	0.095	0.00558	0.000	0.000	0.006
Two (2) Manual Metal Inert Gas (MIG)(E70S-3)	2	negl. (for maintenance only)		0.0051	0.0003	--	--	0.000	0	0.000	0.000	0.000

	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rat (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	1	0.25	6	0.1622	0.0005	0.0001	0.0003	0.015	0.000	0.000	0.000	0.000

EMISSION TOTALS	PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr	1.55	0.09	0.00	0.00	0.09
Potential Emissions lbs/day	37.16	2.17	0.00	0.00	2.17
Potential Emissions tons/year	**6.78**	0.40	0.00	0.00	0.40

METHODOLGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.
Welding and other flame cutting emission factors are from an internal training session document.
See AP-42, Chapter 12.19 for additional emission factors for welding.

Appendix A: Emissions Calculations
Particulater Matter (PM) Emissions

Company Name: Brinly-Hardy Company
Address City IN Zip: 3230 Industrial Parkway, Jeffersonville, IN 47130
Permit No.: 019-22736
Plt ID: 019-00098
Reviewer: AY/EVP

Particulate Matter Emissions from Metal Grinders (MG 1-3)

PM/PM10:	0.0003	gr/acf outlet x	800	acf/min x	60	min/hr /	7000	gr/lb x	4.38	ton/yr / lb/hr x	0.01	(1- control effeciency) =	**0.75 tons/yr (uncontrolled)**
	where the baghouse control efficiency is listed at		99.00%										**0.01 tons/yr (controlled)**

Particulate Matter Emissions from Plow Grinding and Polishing Operation

PM/PM10:	0.0003	gr/acf outlet x	900	acf/min x	60	min/hr /	7000	gr/lb x	4.38	ton/yr / lb/hr x	0.01	(1- control effeciency) =	**0.84 tons/yr (uncontrolled)**
	where the baghouse control efficiency is listed at		99.00%										**0.01 tons/yr (controlled)**

Total: **1.60 tons/yr (uncontrolled)**
0.02 tons/yr (controlled)

Methodology
Uncontrolled PM/PM10 = grain loading (gr/acf outlet) * Flow rate (acfm) * (60 min/hr) * (1 lb/7000 gr) * 4.38 (tons/yr / lb/hr) / (1- control effeciency %)