



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: December 4, 2006  
RE: Indiana Tube Corporation / 163-22805-00081  
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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Indianapolis, Indiana 46204-2251  
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**MINOR SOURCE OPERATING PERMIT RENEWAL  
OFFICE OF AIR QUALITY  
and  
CITY OF EVANSVILLE ENVIRONMENTAL PROTECTION  
AGENCY (EEPA)**

**Indiana Tube Corporation  
2100 Lexington Avenue  
Evansville, Indiana 47720**

(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.: 163-22805-00081	
Issued by: Original Signed By:  Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: December 4, 2006  Expiration Date: December 4, 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) and the Evansville Environmental Protection Agency (EEPA). The information describing the source contained in Conditions A.1 through 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)]

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The Permittee owns and operates a stationary plant that manufactures small diameter steel tubing for refrigerator condensers.

Authorized Individual:	Environmental and Safety Manager
Source Address:	2100 Lexington Avenue, Evansville, IN 47720
Mailing Address:	2100 Lexington Avenue, Evansville, IN 47720
General Source Phone Number:	(812) 421-9028
SIC Code:	3317
County Location:	Vanderburgh
Source Location Status:	Nonattainment for PM 2.5 Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Nonattainment NSR Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) 704 cubic feet per hour, natural gas-fired, inert gas generator, identified as inert gas producer #4 (GPI), installed on December 29, 1997. This unit collects emissions from natural gas combustion at the source;
- (b) One (1) 3000 gallon above-ground, horizontal storage tank used for storage of mineral spirits, installed in 1983 and vented with a pressure valve;
- (c) Three (3) automatic welders that attach steel structural wire to tubing and exhausts respectively to stacks #7, #8 and #18, utilizing resistant welding methods. The welders were installed in May, 1996, December, 2000, and October, 2002, respectively;
- (d) One (1) mill, identified as Mill 3 consisting of wash tank, welder, annealer, quench, copper sulfate plating system and anti-tarnish machine exhausting to stacks #4, #6 and #6A. Mill 3 was installed in July, 1981;
- (e) One (1) mill, identified as Mill 4 consisting of wash tank, welder, annealer, quench, copper sulfate plating system and anti-tarnish machine exhausting to stacks #3, #3A, #5 and #5A. Mill 4 was installed in November, 1986;
- (f) One (1) mill, identified as Mill 5 consisting of wash tank, welder, annealer, quench, copper sulfate plating system and anti-tarnish machine exhausting to stacks #1, #2 and #2A. Mill 5 was installed in July, 1991;

- (g) One (1) mill, identified as Mill 6 consisting of wash tank, welder, annealer, quench and anti-tarnish machine exhausting to stacks #3, and #6A. Mill 6 was installed in March, 1995. Mill 6 does not have a plating system;
- (h) One (1) mill, identified as Mill 7 consisting of wash tank, welder, annealer, quench and anti-tarnish machine. Mill 7 was installed in March, 2004. Mill 7 does not have a plating system;
- (i) One lab hood exhausting to stack #17A;
- (j) One (1) E-Coat painting system using an electro-deposition process where parts are submerged in paint that is electrically charged to deposit paint on the part surface. The E-Coat painting system was installed in June, 2003, and consists of the following units:
  - (1) one (1) E-Coat painting system with maximum application rate of 545 square feet per gallon of coating and maximum coating rate of 15,500 square feet per hour.
  - (2) one (1) natural gas fired soap tank with maximum heat input capacity of 1.28 MMBtu/hour.
  - (3) one (1) natural gas fired oven with maximum heat input capacity of 1.50 MMBtu/hour.

## **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, MSOP 163-22805-00081, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ and the EEPA, 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 EEPA, 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 and the EEPA, within a reasonable time, any information that IDEM, OAQ and the EEPA, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and the EEPA, 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

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- (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)]

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- (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

and

City of Evansville  
Environmental Protection Agency  
C.K. Newsome Community Center, Suite 100  
100 East Walnut Street  
Evansville, IN 47713

- (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 and the EEPA on or before the date it is due.

#### B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ and/or the EEPA upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and the EEPA. IDEM, OAQ and the EEPA 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]**

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- (a) All terms and conditions of permits established prior to 163-22805-00081 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)]**

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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]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and the EEPA, 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

and

City of Evansville  
Environmental Protection Agency  
C.K. Newsome Community Center, Suite 100  
100 East Walnut Street  
Evansville, IN 47713

- (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 and the EEPA 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 and the EEPA takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and the EEPA 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]**

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- (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

and

City of Evansville  
Environmental Protection Agency  
C.K. Newsome Community Center, Suite 100  
100 East Walnut Street  
Evansville, IN 47713

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 and the EEPA within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.15 Source Modification Requirement**

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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]**

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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, the EEPA, 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

and

City of Evansville  
Environmental Protection Agency  
C.K. Newsome Community Center, Suite 100  
100 East Walnut Street  
Evansville, IN 47713

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 or the EEPA by the date specified on the invoice.
- (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 or may call the EEPA at 812-435-6145 to determine the appropriate permit fee.

**B.19 Credible Evidence [326 IAC 1-1-6]**

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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 and the EEPa, the fact that continuance of this permit is not consistent with purposes of this article.

#### C.3 Opacity [326 IAC 5-1]

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

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

#### C.4 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.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

and

City of Evansville  
Environmental Protection Agency  
C.K. Newsome Community Center, Suite 100  
100 East Walnut Street  
Evansville, IN 47713

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

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

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

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

and

City of Evansville  
Environmental Protection Agency  
C.K. Newsome Community Center, Suite 100  
100 East Walnut Street  
Evansville, IN 47713

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

- (b) The Permittee shall notify IDEM, OAQ and the EEPA of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and the EEPA not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and the EEPA, 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]**

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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]**

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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]**

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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]**

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- (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.

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

#### **C.11 Malfunctions Report [326 IAC 1-6-2]**

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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), the EEPA, 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, and the EEPA, 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.12 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 EEPA makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and the Director of the EEPA 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.13 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

and

City of Evansville  
Environmental Protection Agency  
C.K. Newsome Community Center, Suite 100  
100 East Walnut Street  
Evansville, IN 47713

- (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 and the EEPA, 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.
- (e) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

## SECTION D.1 EMISSIONS UNITS OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) 704 cubic feet per hour, natural gas-fired, inert gas generator, identified as inert gas producer #4 (GPI), installed on December 29, 1997. This unit collects emissions from natural gas combustion at the source;
- (b) One (1) 3000 gallon above-ground, horizontal storage tank used for storage of mineral spirits, installed in 1983 and vented with a pressure valve;
- (c) Three (3) automatic welders that attach steel structural wire to tubing and exhausts respectively to stacks #7, #8 and #18, utilizing resistant welding methods. The welders were installed in May, 1996, December, 2000, and October, 2002, respectively;
- (d) One (1) mill, identified as Mill 3 consisting of wash tank, welder, annealer, quench, copper sulfate plating system and anti-tarnish machine exhausting to stacks #4, #6 and #6A. Mill 3 was installed in July, 1981;
- (e) One (1) mill, identified as Mill 4 consisting of wash tank, welder, annealer, quench, copper sulfate plating system and anti-tarnish machine exhausting to stacks #3, #3A, #5 and #5A. Mill 4 was installed in November, 1986;
- (f) One (1) mill, identified as Mill 5 consisting of wash tank, welder, annealer, quench, copper sulfate plating system and anti-tarnish machine exhausting to stacks #1, #2 and #2A. Mill 5 was installed in July, 1991;
- (g) One (1) mill, identified as Mill 6 consisting of wash tank, welder, annealer, quench and anti-tarnish machine exhausting to stacks #3, and #6A. Mill 6 was installed in March, 1995. Mill 6 does not have a plating system;
- (h) One (1) mill, identified as Mill 7 consisting of wash tank, welder, annealer, quench and anti-tarnish machine. Mill 7 was installed in March, 2004. Mill 7 does not have a plating system;
- (i) One lab hood exhausting to stack #17A;
- (j) One (1) E-Coat painting system using an electro-deposition process where parts are submerged in paint that is electrically charged to deposit paint on the part surface. The E-Coat painting system was installed in June, 2003, and consists of the following units:
  - (1) one (1) E-Coat painting system with maximum application rate of 545 square feet per gallon of coating and maximum coating rate of 15,500 square feet per hour.
  - (2) one (1) natural gas fired soap tank with maximum heat input capacity of 1.28 MMBtu/hour.
  - (3) one (1) natural gas fired oven with maximum heat input capacity of 1.50 MMBtu/hour.

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

## Emission Limitations and Standards

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

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Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three (3.0) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

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

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Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the E-Coat Paint System during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

### D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

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Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for anti-tarnish units constructed after January 1, 1980, the Permittee shall:

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

### D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the mineral spirit surface coating operations (Mills 3, 4, 5, 6, and 7).

## Compliance Determination Requirements

### D.1.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

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

## Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

### D.1.6 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents; and
  - (2) The volume weighted VOC content of the coatings used for each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
and  
CITY OF EVANSVILLE  
ENVIRONMENTAL PROTECTION AGENCY**

**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).

<b>Company Name:</b>	Indiana Tube Corporation
<b>Address:</b>	2100 Lexington Avenue
<b>City:</b>	Evansville, Indiana 47720
<b>Phone #:</b>	(812) 424-9028
<b>MSOP #:</b>	163-22805-00081

I hereby certify that Indiana Tube Corporation is  still in operation.  
 no longer in operation.

I hereby certify that Indiana Tube Corporation is  
 in compliance with the requirements of MSOP 163-22805-00081.  
 not in compliance with the requirements of MSOP 163-22805-00081.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>



**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:

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**Indiana Department of Environmental Management  
Office of Air Quality and  
The City of Evansville Environmental Protection Agency (EEPA)**

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

<b>Source Name:</b>	Indiana Tube Corporation
<b>Source Location:</b>	2100 Lexington Avenue, Evansville, Indiana 47720
<b>County:</b>	Vanderburgh
<b>Permit Renewal No.:</b>	163-22805-00081
<b>SIC Code:</b>	3317
<b>Permit Reviewer:</b>	Tanya White / EVP

On October 6, 2006, the Office of Air Quality (OAQ) had a notice published in the Evansville Courier, Evansville, Indiana, stating that Indiana Tube Corporation had applied for a Minor Source Operating Permit (MSOP) to continue to operate a source that manufactures small diameter steel tubing for refrigerator condensers. 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.

On October 13, 2006, Indiana Tube Corporation submitted comments on the proposed permit. The summary of the comments and corresponding responses are as follows:

**Comment 1**

In reference to Condition D.1.4 , Indiana Tube Corporation believes the preventive maintenance plan may be unnecessary due to the fact the mineral spirit dip tank on Mills 3, 4, 5, 6, and 7 are simple tanks with each equipped with a cover and each tank requires very little maintenance or repairs and have few spare parts.

**Response 1**

Pursuant to 326 IAC 1-6-3 (Preventative Maintenance Plan), any facility that is required to obtain a permit under 326 IAC 2-5.1(Construction of New Sources) or 326 IAC 2-6.1(MSOP) is required to submit a preventative maintenance plan. Since the source is required to obtain an MSOP permit for the mineral spirit surface coating operations, a preventative maintenance plan is required for these operations. As such, there have been no changes to the permit as a result of this comment.

**Comment 2**

There was an error in the maximum usage of mineral spirits used in Mills 3 through 7. The correct maximum usage of mineral spirits is 2.2 gallons per hour or 19,272 gallons per year (2.2 gallons/hour X 8,760 hours/year). Also, Indiana Tube Corporation does not use xylene in any surface coating operations (Mills 3, 4, 5, 6 and 7) as is included on the emission calculations that accompany the permit. The source currently uses a mineral spirit that does not contain any HAPs. The MSDS information has been provided.

Also, please note we use Butyl Cellosolve Solvent (CAS# 111-76-2) as an addition to the E-Coat painting process to assist the flow ability of the E-Coat paint. The MSDS for Butyl Cellosolve Solvent has been provided as an attachment to these comments. The maximum usage of Butyl Cellosolve Solvent is 0.16 gallons per hour or 1,401 gallons per year (0.16 gallons/hour X 8,760 hours/year). The VOC content of Butyl Cellosolve Solvent is 7.52 pounds per gallon.

**Response 2**

The emissions calculations have been revised as suggested. The Office of Air Quality 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 the Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and are part of the record regarding the permit decision. The permit level did not change as a result of these revisions to the potential to emit calculations. The Technical Support Document has been revised in this addendum as follows (additions in bold, deletions in ~~strikeout~~):

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, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	0.01
PM-10	0.05
SO <sub>2</sub>	0.09
VOC	<del>82.43</del> <b>73.36</b>
CO	0.33
NO <sub>x</sub>	0.32

HAPs	Potential to Emit (tons/yr)
<del>Xylene</del>	<del>0.59</del>
Hexane	0.03
Total HAPs	<del>0.62</del> <b>0.03</b>

Source Status

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

Pollutant	Potential to Emit (tons/yr)
PM	0.01
PM-10	0.05
SO <sub>2</sub>	0.09
VOC	<del>82.43</del> <b>73.36</b>
CO	0.33
NO <sub>x</sub>	0.32

HAPs	Potential to Emit (tons/yr)
Xylene	0.59
Hexane	0.03
Total HAPs	<del>0.62</del> <b>0.03</b>

Upon further review IDEM, OAQ has made the following changes to the MSOP because Indiana Tube Corporation is located in Evansville, Indiana and is within the jurisdiction of the Evansville Environmental Protection Agency (EEPA) (additions in bold, deletions in ~~strikeout~~):

## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) **and the Evansville Environmental Protection Agency (EEPA)**. The information describing the source contained in Conditions A.1 through 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.

### 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, MSOP 163-22805-00081, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ **and the EEPA**, 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.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 EEPA**, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.7 Duty to Provide Information

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

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

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- (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

**and**

**City of Evansville  
Environmental Protection Agency  
C.K. Newsome Community Center, Suite 100  
100 East Walnut Street  
Evansville, IN 47713**

- (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 **and the EEPA** on or before the date it is due.

**B.10 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ **and/or the EEPA** upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ **and the EEPA**. IDEM, OAQ **and the EEPA** 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.13 Permit Renewal [326 IAC 2-6.1-7]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, **and the EEPA**, 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  
**and**

**City of Evansville  
Environmental Protection Agency  
C.K. Newsome Community Center, Suite 100  
100 East Walnut Street  
Evansville, IN 47713**

- (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 **and the EEPA** 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 **and the EEPA** takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ **and the EEPA** 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]**

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- (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

**and**

**City of Evansville  
Environmental Protection Agency  
C.K. Newsome Community Center, Suite 100  
100 East Walnut Street  
Evansville, IN 47713**

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 **and the EEPA** within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**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]**

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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, **the EEPA**, 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]**

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- (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

**and**

**City of Evansville  
Environmental Protection Agency  
C.K. Newsome Community Center, Suite 100  
100 East Walnut Street  
Evansville, IN 47713**

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]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing **or the EEPA by the date specified on the invoice.**
- (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 **or may call the EEPA at 812-435-6145 to determine the appropriate permit fee.**

**C.2 Permit Revocation [326 IAC 2-1.1-9]**

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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 **and the EEPA**, the fact that continuance of this permit is not consistent with purposes of this article.

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

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:

- (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

**and**

**City of Evansville  
Environmental Protection Agency  
C.K. Newsome Community Center, Suite 100  
100 East Walnut Street  
Evansville, IN 47713**

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

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

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

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

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

**and**

**City of Evansville  
Environmental Protection Agency  
C.K. Newsome Community Center, Suite 100  
100 East Walnut Street  
Evansville, IN 47713**

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

- (b) The Permittee shall notify IDEM, OAQ **and the EEPA** of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ **and the EEPA** not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ **and the EEPA**, 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.

#### C.11 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), **the EEPA**, 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, **and the EEPA**, 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.12 General Record Keeping Requirements [326 IAC 2-6.1-5]

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- (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 EEPA** makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner **and the Director of the EEPA** 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.13 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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- (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

**and**

**City of Evansville  
Environmental Protection Agency  
C.K. Newsome Community Center, Suite 100  
100 East Walnut Street  
Evansville, IN 47713**

- (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 **and the EEPA**, 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.
- (e) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

**Indiana Department of Environmental Management  
Office of Air Quality**

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

**Source Background and Description**

<b>Source Name:</b>	Indiana Tube Corporation
<b>Source Location:</b>	2100 Lexington Avenue, Evansville, Indiana 47720
<b>County:</b>	Vanderburgh
<b>SIC Code:</b>	3317
<b>Operation Permit No.:</b>	163-14073-00081
<b>Operation Permit Issuance Date:</b>	June 13, 2001
<b>Permit Renewal No.:</b>	163-22805-00081
<b>Permit Reviewer:</b>	Tanya White / EVP

The Office of Air Quality (OAQ) has reviewed an application from Indiana Tube Corporation relating to the operation of a plant that manufactures small diameter steel tubing for refrigerator condensers.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) 704 cubic feet per hour, natural gas-fired, inert gas generator, identified as inert gas producer #4 (GPI), installed on December 29, 1997. This unit collects emissions from natural gas combustion at the source;
- (b) One (1) 3000 gallon above-ground, horizontal storage tank used for storage of mineral spirits, installed in 1983 and vented with a pressure valve;
- (c) Three (3) automatic welders that attach steel structural wire to tubing and exhausts respectively to stacks #7, #8 and #18, utilizing resistant welding methods. The welders were installed in May, 1996, December, 2000, and October, 2002, respectively;
- (d) One (1) mill, identified as Mill 3 consisting of wash tank, welder, annealer, quench, copper sulfate plating system and anti-tarnish machine exhausting to stacks #4, #6 and #6A. Mill 3 was installed in July, 1981;
- (e) One (1) mill, identified as Mill 4 consisting of wash tank, welder, annealer, quench, copper sulfate plating system and anti-tarnish machine exhausting to stacks #3, #3A, #5 and #5A. Mill 4 was installed in November, 1986;
- (f) One (1) mill, identified as Mill 5 consisting of wash tank, welder, annealer, quench, copper sulfate plating system and anti-tarnish machine exhausting to stacks #1, #2 and #2A. Mill 5 was installed in July, 1991;
- (g) One (1) mill, identified as Mill 6 consisting of wash tank, welder, annealer, quench and anti-tarnish machine exhausting to stacks #3, and #6A. Mill 6 was installed in March, 1995. Mill 6 does not have a plating system;

- (h) One (1) mill, identified as Mill 7 consisting of wash tank, welder, annealer, quench and anti-tarnish machine. Mill 7 was installed in March, 2004. Mill 7 does not have a plating system;
- (i) One lab hood exhausting to stack #17A;
- (j) One (1) E-Coat painting system using an electro-deposition process where parts are submerged in paint that is electrically charged to deposit paint on the part surface. The E-Coat painting system was installed in June, 2003, and consists of the following units:
  - (1) one (1) E-Coat painting system with maximum application rate of 545 square feet per gallon of coating and maximum coating rate of 15,500 square feet per hour.
  - (2) one (1) natural gas fired soap tank with maximum heat input capacity of 1.28 MMBtu/hour.
  - (3) one (1) natural gas fired oven with maximum heat input capacity of 1.50 MMBtu/hour.

### **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 Source**

- (a) One (1) powder coat line, identified as Paint Line #2, which was removed from operation in July, 2005, consisting of:
  - (1) One (1) 1.493 mmBtu/hr natural gas wash tank exhausting to stack #15, #16;
  - (2) One (1) 1.65 mmBtu/hr natural gas oven, exhausting to stack #17; and
  - (3) One (1) powder coat booth, with no exhaust, with a maximum capacity of 125 pounds of powder per hour, using an electrostatic spraying system and excess powder recycling.
- (b) One (1) rework test line consisting of one (1) dip tank with maximum mineral spirit usage of 2000 gallons per year.

### **Existing Approvals**

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

- (a) MSOP163-14073-00081 issued on June 13, 2001;
- (b) 163-16524-00081- First Minor Permit Revision issued on January 10, 2003;
- (c) 163-18610-00081- First Notice Only Change issued on April 14, 2004; and
- (d) 163-18896-00081- Second Notice Only Change issued on June 1, 2004.

All conditions from previous approvals were incorporated into this permit except the following conditions related to the powder coat line (Paint Line #2), which has been removed from the source.

**D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the powder coat paint booth shall not exceed 0.64 pounds per hour when operating at a process weight rate of 0.06 tons per hour.

This limit was calculated from the following equation:

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

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

**Enforcement Issue**

There are no enforcement actions pending.

**Stack Summary**

Stack ID	Operation	Height (ft)	Diameter (in)	Flow Rate (acfm)	Temperature (°F)
#7	Welder	21	48	18,000	78
#8	Welder	22	48	27,000	79
#18	Welder	22	48	27,000	79
#4	Mill 3	22.5	32	6,249	74
#6	Mill 3	22	12	2,000	79
#6A	Mill 3	22	12	2,000	79
#3	Mill 4	22.5	32	6,249	74
#3A	Mill 4	22	12	2,000	74
#5	Mill 4	21	12	2,000	74
#5A	Mill 4	22	12	2,000	74
#1	Mill 5	24	12	2,000	72
#2	Mill 5	20.5	12	3,000	92
#2A	Mill 5	22	12	2,000	79
#3	Mill 6	22.5	32	6,249	74
#6A	Mill 6	22	12	2,000	79
	Mill 7	15	4	2,000	74
#17A	Lab Hood	22	12	2,000	74
#25	E-Coating Paint System-Washer	25	32	6,500	79
#26	E-Coating Paint System-Oven	37	32	10,500	85

**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.

A complete application for the purposes of this review was received on March 15, 2006.

### Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 7)

### 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, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	0.01
PM-10	0.05
SO <sub>2</sub>	0.09
VOC	82.43
CO	0.33
NO <sub>x</sub>	0.32

HAPs	Potential to Emit (tons/yr)
Xylene	0.59
Hexane	0.03
Total HAPs	<b>0.62</b>

- (a) The potential to emit of all criteria pollutants are less than 100 tons per year and the potential to emit of VOCs are greater than 25 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 of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs are less than twenty-five (25) tons per year.

### County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Nonattainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana and re-designating Vanderburgh County to an attainment area (from a nonattainment area) for the 8-hour standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate this change into 326 IAC 1-4-1. A permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.

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

### Source Status

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

Pollutant	Potential to Emit (tons/yr)
PM	0.01
PM-10	0.05
SO <sub>2</sub>	0.09
VOC	82.43
CO	0.33
NO <sub>x</sub>	0.32

HAPs	Potential to Emit (tons/yr)
Xylene	0.59
Hexane	0.03
Total HAPs	0.62

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

## Part 70 Permit Determination

### 326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit M163-22805-00081, 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) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) The 3000 gallon above-ground, horizontal storage tank used for storage of mineral spirits and the mineral spirit dip tank for the rework test line are not subject to the New Source Performance Standards (NSPS) 326 IAC 12 and 40 CFR 60, Subpart Ka), based on the maximum capacity of the storage tanks.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.

## State Rule Applicability – Entire Source

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

The source is not one of the twenty-eight (28) listed source categories, the source is located in Vanderburgh County, and the potential to emit of each regulated pollutant is less than 250 tons per year. This source is not a major source pursuant to 326 IAC 2-2, PSD, and the requirements of 326 IAC 2-2 are not applicable.

### Nonattainment NSR

U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Vanderburgh County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review (NSR) requirements. This source is not subject to the Non-attainment NSR requirements because potential PM10 emissions from this source are less than 100 tons per year.

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

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

Pursuant to 326 IAC 6-5-1(b), the requirements of 326 IAC 6-5 do not apply. This source is not subject to the requirements of this rule because it is not a new source of fugitive particulate emissions and fugitive emissions are negligible.

**State Rule Applicability – Individual Facilities**

**326 IAC 8-1-6 (General Volatile Organic Compound Reduction Requirements)**

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8. This rule does not apply to the E-Coat painting system because this facility is subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating) and these facilities have a potential to emit of VOCs of less than 25 tons per year.

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

The operation of this source will not emit greater than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**326 IAC 8-3-2 (Cold Cleaner Operation)**

The Anti Tarnish Units are subject to 326 IAC 8-3-2, because these operations are similar to degreasing operation and they were constructed after January 1, 1980. As such, the Permittee shall:

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

**326 IAC 8-3-5 (Cold Cleaner Operation and Controls)**

The Anti Tarnish Units are not subject to 326 IAC 8-3-5, because these units have remote solvent reservoirs.

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

- (a) The E-Coat Paint System has negligible PM emissions. Pursuant to 326 IAC 6-3-1(b)(14), operations that have a PM potential to emit of less than 0.551 lb/hr are exempt from the requirements of 326 IAC 6-3-2; Therefore, 326 IAC 6-3-2 does not apply.

- (b) The three (3) automatic welders, which utilize a resistance welding method, have negligible PM emissions. Pursuant to 326 IAC 6-3-1(b)(14), operations that have a PM potential to emit of less than 0.551 lb/hr are exempt from the requirements of 326 IAC 6-3-2; Therefore, 326 IAC 6-3-2 does not apply.
- (c) There are no PM emissions from Mills 3 through 7. Pursuant to 326 IAC 6-3-1(b)(14), operations that have a PM potential to emit of less than 0.551 lb/hr are exempt from the requirements of 326 IAC 6-3-2; Therefore, 326 IAC 6-3-2 does not apply.

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

The E-Coat Spray System has actual emissions of VOCs greater than 15 pounds per day and was constructed after July 1, 1990. The source SIC code is 3317. Pursuant to 326 IAC 8-2-9(d)(4), the volatile organic compound (VOC) content of the coating delivered to the applicator at the E-Coat Spray System shall be limited to 3.0 pounds of VOCs per gallon of coating less water.

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

Based on the MSDS submitted by the source and calculations made, the E-Coat Spray System is in compliance with this requirement.

**Conclusion**

The operation of this stationary steel tubing manufacturing plant shall be subject to the conditions of the Minor Source Operating Permit 163-22805-00081.

**Appendix A: Emissions Calculations  
Emissions Summary**

**Company Name:** Indiana Tube Corporation  
**Address City IN Zip:** 2100 Lexington Avenue, Evansville, Indiana 47720  
**Permit Number:** MSOP163-22805-00081  
**Plt ID:** 163-00081  
**Reviewer:** Tanya White/EVP  
**Date:** Nov-06

**Uncontrolled Potential to Emit (tons/year)**

Emissions Generating Activity

Pollutant	Generator	Surface Coating Operations	Soap Tank and Oven	E Coating Line	Total
PM	0.01	0.00	0.00	0.00	0.01
PM-10	0.02	0.00	0.02	0.00	0.05
SO2	0.00	0.00	0.09	0.00	0.09
NOx	0.31	0.00	0.01	0.00	0.32
VOC	0.02	63.12	1.22	9.01	73.36
CO	0.26	0.00	0.07	0.00	0.33
total HAPs	0.01	0.00	0.02	0.00	0.03
worst case single HAP	0.01	0.00	0.00	0.00	

**Hexane**

**Hexane**

**Controlled Potential to Emit (tons/year)**

Emissions Generating Activity

Pollutant	Generator	Surface Coating Operations	Soap Tank and Oven	E Coating Line	Total
PM	0.01	0.00	0.00	0.00	0.01
PM-10	0.02	0.00	0.02	0.00	0.05
SO2	0.00	0.00	0.09	0.00	0.09
NOx	0.31	0.00	0.01	0.00	0.32
VOC	0.02	63.12	1.22	9.01	73.36
CO	0.26	0.00	0.07	0.00	0.33
total HAPs	0.01	0.00	0.02	0.00	0.03
worst case single HAP	0.01	0.00	0.00	0.00	

**Hexane**

**Hexane**

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only (704 CF per Hour)  
 MM BTU/HR <100  
 Inert Gas Generator**

**Company Name:** Indiana Tube Corporation  
**Address City IN Zip:** 2100 Lexington Avenue, Evansville, Indiana 47720  
**Permit Number:** MSOP163-22805-00081  
**Pit ID:** 163-00081  
**Reviewer:** Tanya White/EVP  
**Date:** Nov-06

**Capacity (cf/yr) =  
 6167040**

Heat Input Capacity  
 MMBtu/hr

0.704

Potential Throughput  
 MMCF/yr

6.2

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.01	0.02	0.00	0.31	0.02	0.26

\*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 to Reviewer: 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**  
**Inert Gas Generator, Paint Line Ovens, Wash Tank**  
**HAP Emissions**

**Company Name:** Indiana Tube Corporation  
**Address City IN Zip:** 2100 Lexington Avenue, Evansville, Indiana 47720  
**Permit Number:** MSOP163-22805-00081  
**Pit ID:** 163-00081  
**Reviewer:** Tanya White/EVP  
**Date:** Nov-06

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	6.48E-06	3.70E-06	2.31E-04	5.55E-03	1.05E-05

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	1.54E-06	3.39E-06	4.32E-06	1.17E-06	6.48E-06

Methodology is the same as previous page.

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: Emissions Calculations  
 Natural Gas Combustion Only  
 MM BTU/HR <100  
 1.28 mmBtu/hr Soap Tank and 1.5 mmBtu/hr Oven**

**Company Name:** Indiana Tube Corporation  
**Address City IN Zip:** 2100 Lexington Avenue, Evansville, Indiana 47720  
**Permit Number:** MSOP163-22805-00081  
**Pit ID:** 163-00081  
**Reviewer:** Tanya White/EVP  
**Date:** Nov-06

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

2.8

24.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.02	0.09	0.01	1.22	0.07	1.02

\*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 to Reviewer: 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**

**1.28 mmBtu/hr Soap Tank and 1.5 mmBtu/hr Oven**

**HAP Emissions**

**Company Name:** Indiana Tube Corporation  
**Address City IN Zip:** 2100 Lexington Avenue, Evansville, Indiana 47720  
**Permit Number:** MSOP163-22805-00081  
**Pit ID:** 163-00081  
**Reviewer:** Tanya White/EVP  
**Date:** Nov-06

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.56E-05	1.46E-05	9.13E-04	2.19E-02	4.14E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	6.1E-06	1.3E-05	1.7E-05	4.6E-06	2.6E-05

Methodology is the same as previous page.

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: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

**Company Name:** Indiana Tube Corporation  
**Address City IN Zip:** 2100 Lexington Avenue, Evansville, Indiana 47720  
**Permit Number:** MSOP163-22805-00081  
**Pit ID:** 163-00081  
**Reviewer:** Tanya White/EVP  
**Date:** Nov-06

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Maximum (gal/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)	Transfer Efficiency
Mineral Spirits	6.55	100.00%	0.0%	100.0%	0.0%	0.00%	2.20	6.55	6.55	14.41	345.84	63.12	0.00	0%

<b>Uncontrolled Potential Emissions from Each Mill</b>	<b>Add worst case coating to all solvents</b>	<b>2.88</b>	<b>69.17</b>	<b>12.62</b>	<b>0.00</b>
<b>Uncontrolled Potential Emissions from Mills 3-7</b>		<b>14.41</b>	<b>345.84</b>	<b>63.12</b>	<b>0.00</b>

**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) \* Maximum (gal/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Maximum (gal/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Maximum (gal/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (gal/hour) \* (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  
There are no HAPs included in the MSDS information for this material.

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

**Company Name:** Indiana Tube Corporation  
**Address City IN Zip:** 2100 Lexington Avenue, Evansville, Indiana 47720  
**Permit Number:** MSOP163-22805-00081  
**Pit ID:** 163-00081  
**Reviewer:** Tanya White/EVP  
**Date:** Nov-06

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Maximum (gal/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)	Transfer Efficiency	Potential HAPs tons per year
E-Coating	9.20	0.33%	0.00%	0.33%	0.00%	34.00%	28.44	0.03	0.03	0.85	20.48	3.74	0.00	100%	0.00
Butyl Cellosolve Solvent	7.52	100.00%	0.00%	100.00%	0.00%	0.00%	0.16	7.52	7.52	1.20	28.88	5.27	0.00	100%	0.00

**Uncontrolled Potential Emissions (tons/year) =**

**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) \* Maximum (gal/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Maximum (gal/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Maximum (gal/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (gal/hour) \* (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)  
There are no HAPs included in the MSDS information for these materials.