



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: September 6, 2006
RE: Galbreath, Inc / 131-22924-00004
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



Mitchell E. Daniels, Jr.
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100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
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**Federally Enforceable State Operating Permit
Renewal
OFFICE OF AIR QUALITY**

**Galbreath, Inc.
US 35 and Rossier Drive
Winamac, Indiana 46996**

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

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

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

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

Operation Permit No.: 131-22924-00004	
Original signed by Nisha Sizemore, Chief Permits Branch Office Of Air Quality	Issuance Date: September 6, 2006 Expiration Date: September 6, 2011

SECTION A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-8-3(b)]	4
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	4
A.3	Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]	4
A.4	FESOP Applicability [326 IAC 2-8-2]	5
SECTION B	GENERAL CONDITIONS	6
B.1	Definitions [326 IAC 2-8-1]	6
B.2	Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	6
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	6
B.4	Enforceability [326 IAC 2-8-6]	6
B.5	Severability [326 IAC 2-8-4(4)]	6
B.6	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	6
B.7	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	6
B.8	Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	6
B.9	Compliance Order Issuance [326 IAC 2-8-5(b)]	7
B.10	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	7
B.11	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]	7
B.12	Emergency Provisions [326 IAC 2-8-12]	8
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]	9
B.14	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	10
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	10
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination. [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	10
B.17	Permit Renewal [326 IAC 2-8-3(h)]	11
B.18	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	11
B.19	Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	11
B.20	Permit Revision Requirement [326 IAC 2-8-11.1]	12
B.21	Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]	12
B.22	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	13
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]	13
B.24	Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	13
SECTION C	SOURCE OPERATION CONDITIONS	15
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	15
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	15
C.2	Overall Source Limit [326 IAC 2-8]	15
C.3	Opacity [326 IAC 5-1]	15
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	15
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	16
C.6	Fugitive Dust Emissions [326 IAC 6-4]	16
C.7	Stack Height [326 IAC 1-7]	16
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	16
	Testing Requirements [326 IAC 2-8-4(3)]	17
C.9	Performance Testing [326 IAC 3-6]	17
	Compliance Requirements [326 IAC 2-1.1-11]	17
C.10	Compliance Requirements [326 IAC 2-1.1-11]	17
	Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]	17
C.11	Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]	17
C.12	Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]	18
C.13	Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]	18

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]	18
C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]	18
C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]	18
C.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]	18
C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]	19
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]	20
C.18 General Record Keeping Requirements[326 IAC 2-8-4(3)] [326 IAC 2-8-5]	20
C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]	20
Stratospheric Ozone Protection	20
C.20 Compliance with 40 CFR 82 and 326 IAC 22-1	20
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS	22
Emission Limitations and Standards [326 IAC 2-8-4(1)]	22
D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 2-2]	22
D.1.2 HAPs Limitations [326 IAC 2-8-4][40 CFR 63, Subpart M]	22
D.1.3 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]	23
D.1.4 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9(f)]	23
D.1.5 Particulate Emission Limitations [326 IAC 6-3-2(d)]	23
D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]	23
Compliance Determination Requirements	23
D.1.7 Volatile Organic Compounds and Hazardous Air Pollutents (VOC and HAPs)[326 IAC 8-1-2] [326 IAC 8-1-4]	23
Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]	23
D.1.8 Monitoring	23
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]	24
D.1.9 Record Keeping Requirements	24
D.1.10 Reporting Requirements	24
SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS	25
D.2.1 Particulate Emission Limitations [326 IAC 6-3-2]	25
D.2.2 Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-5]	25
D.2.3 Cold Cleaner Operations [326 IAC 8-3-2]	26
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION	27
EMERGENCY OCCURRENCE REPORT	28
FESOP Quarterly Reports	30
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT	34

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary metal fabrication process.

Authorized Individual:	Environmental Health and Safety Director
Source Address:	US 35 and Rossier Drive, Winamac, IN 46996
Mailing Address:	P.O. Box 2678, Lakeland, FL 33840
General Source Phone Number:	(574) 946-6631
SIC Code:	3444
County Location:	Pulaski
Source Location Status:	Attainment for all criteria pollutants.
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act

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

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

- (a) Two (2) surface coating paint booths, located in Plant 2 East, identified as Booth 1a and Booth 1b, constructed in 1968, utilizing the airless method of spraying and dry filters as control, exhausting to vent 1 (stacks 1 through 8), maximum capacity: 41.18 pounds of paint per hour and 4.24 pounds of solvents per hour, combined.
- (b) Two (2) surface coating paint booths, located in Plant 2 West, identified as Booth 2a and Booth 2b, constructed in 1978 and 1989, respectively, utilizing the airless method of spraying and dry filters as control, exhausting to vents 2a (stack 2) and 2b (stack 3), respectively, maximum capacity: 18.02 pounds of paint per hour and 2.25 pounds of solvents per hour, each.
- (c) Two (2) surface coating paint booths, located in Plant 2 West, identified as Booth 3a and Booth 3b, constructed in 2001, utilizing the electrostatic airless method of spraying and dry filters as control, exhausting to vent 3a and vent 3b, respectively, maximum capacity: 79.18 pounds of primer per hour and 71.27 pounds of finish coat per hour, combined.

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. There are no boilers at this source.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) The following VOC and HAP storage containers:

- (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (e) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (f) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. Three (3) parts washers, using only non-halogenated solvents. [326 IAC 8-3-5] [326 IAC 8-3-2]
- (h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (i) Closed loop heating and cooling systems.
- (j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (k) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (l) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, 131-22924-00004, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

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

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. 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 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

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

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12. Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

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

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

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

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

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

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

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

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

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

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

- (a) All terms and conditions of permits established prior to 131-22924-00004 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,

- (2) revised, or
- (3) deleted.

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

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty.

(30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(a)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, 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 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

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

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

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

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

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

and

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

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC13-30-3-1]

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

the following:

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

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement an administrative amendment addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to

whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in

accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

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

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

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.9 Performance Testing [326 IAC 3-6]

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If

required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

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

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

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 11, 1998.
- (b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) surface coating paint booths, located in Plant 2 East, identified as Booth 1a and Booth 1b, constructed in 1968, utilizing the airless method of spraying and dry filters as control, exhausting to vent 1 (stacks 1 through 8), maximum capacity: 41.18 pounds of paint per hour and 4.24 pounds of solvents per hour, combined.
- (b) Two (2) surface coating paint booths, located in Plant 2 West, identified as Booth 2a and Booth 2b, constructed in 1978 and 1989, respectively, utilizing the airless method of spraying and dry filters as control, exhausting to vents 2a (stack 2) and 2b (stack 3), respectively, maximum capacity: 18.02 pounds of paint per hour and 2.25 pounds of solvents per hour, each.
- (c) Two (2) surface coating paint booths, located in Plant 2 West, identified as Booth 3a and Booth 3b, constructed in 2001, utilizing the electrostatic airless method of spraying and dry filters as control, exhausting to vent 3a and vent 3b, respectively, maximum capacity: 79.18 pounds of primer per hour and 71.27 pounds of finish coat per hour, combined.

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

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 2-2]

The total amount of VOC delivered to the applicators, plus VOC in cleanup solvents used, at the six (6) surface coating paint booths in Plants 1 and 2 (Booth 1a, Booth 1b, Booth 2a, Booth 2b, Booth 3a and Booth 3b) shall be limited to less than 99.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit, in combination with the uncontrolled potential to emit VOC of insignificant activities, will limit the potential to emit VOC from the entire source to less than 100 tons per year and render the requirements of 326 IAC 2-7 (Part 70 Operating Permit Program) and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 HAPs Limitations [326 IAC 2-8-4][40 CFR 63, Subpart M MMM]

HAP emissions will be limited as follows:

- (a) The total amount of any single HAP delivered to the applicators, plus HAP in the cleanup solvents used, at the six (6) surface coating paint booths in Plants 1 and 2 (Booth 1a, Booth 1b, Booth 2a, Booth 2b, Booth 3a and Booth 3b) shall be limited to less than 9.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit in combination with uncontrolled single HAP from insignificant activities, will limit the potential to emit single HAP from the entire source to less than 10 tons per year.
- (b) The combination of HAPs delivered to the applicators, plus HAPs in cleanup solvents used, at the six (6) surface coating paint booths in Plants 1 and 2 (Booth 1a, Booth 1b, Booth 2a, Booth 2b, Booth 3a and Booth 3b) shall be limited to less than 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit in combination with uncontrolled combined HAPs from insignificant activities, keep will limit the potential to emit combined HAPs from the entire source to less than 25 tons per year.

The above limits are necessary to render the requirements of 326 IAC 2-7 (Part 70 Operating Permit Program) and 40 CFR 63 subpart M MMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) not applicable.

D.1.3 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

- (a) Pursuant to T 131-7468-00004, issued on September 24, 1998, the amount of VOC delivered to the applicators, plus VOC in cleanup solvents used, at the one (1) surface coating paint booth, Booth 2b, is limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the potential to emit VOC is less than twenty-five (25) tons per year, and the requirements of 326 IAC 8-2-9 are not applicable.
- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators at the two (2) surface coating paint booths, identified as Booth 3a and Booth 3b, shall be limited to 3.5 pounds of VOC per gallon of coating less water, for air dried coatings.

D.1.4 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9(f)]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of Booth 3a and Booth 3b 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.1.5 Particulate Emission Limitations [326 IAC 6-3-2(d)]

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

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds and Hazardous Air Pollutents (VOC and HAPs)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC and HAPs content contained in condition D.1.1, D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (vent 1 (stacks 1 through 8 at Plant 2 East), vent 2a (stack 2 at Plant 2 West), vent 2b (stack 3 at Plant 2 West), vent 3a and vent 3b) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.3 and the HAP usage limits established in Condition D.1.2.
- (1) The amount and VOC and HAP 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;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC, individual HAP and total HAP usage for each month; and
 - (5) The weight of VOCs, individual HAPs and total HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2 and D.1.3(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. Three (3) parts washers, using only non-halogenated solvents. [326 IAC 8-3-5] [326 IAC 8-3-2]
- (h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

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

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

The welding operations are subject to 326 IAC 6-3-2(e). Based on a process weight rate of 0.015 tons per hour, the particulate emissions shall not exceed 0.25 pounds per hour.

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:

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

D.2.2 Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32)

millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.2.3 Cold Cleaner Operations [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee 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.

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

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

Source Name: Galbreath, Inc.
Source Address: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
Mailing Address: P.O. Box 2678, Lakeland, FL 33840
FESOP No.: F 131-22924-00004

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

Please check what document is being certified:

Annual Compliance Certification Letter

Test Result (specify)

Report (specify)

Notification (specify)

Affidavit (specify)

Other (specify)

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2215
Phone: 317-233-0178
Fax: 317-233-6865**

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

Source Name: Galbreath, Inc.
Source Address: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
Mailing Address: P.O. Box 2678, Lakeland, FL 33840
FESOP No.: F 131-22924-00004

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Galbreath, Inc.
 Source Address: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
 Mailing Address: P.O. Box 2678, Lakeland, FL 33840
 FESOP No.: F 131-22924-00004
 Facility: Six (6) surface coating paint booths in Plants 2 East and 2 West (Booth 1a, Booth 1b, Booth 2a, Booth 2b, Booth 3a and Booth 3b)
 Parameter: VOC delivered to the applicators, plus VOC in cleanup solvents used
 Limit: Less than 99.0 tons per twelve (12) consecutive month period, with the compliance determined at the end of each month.

QUARTER: YEAR:

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Galbreath, Inc.
 Source Address: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
 Mailing Address: P.O. Box 2678, Lakeland, FL 33840
 FESOP No.: F 131-22924-00004
 Facility: Six (6) surface coating paint booths in Plants 2 East and 2 West (Booth 1a, Booth 1b, Booth 2a, Booth 2b, Booth 3a and Booth 3b)
 Parameter: Single HAP delivered to the applicators, plus amount of that HAP in cleanup solvents used
 Limit: Less than 9.0 tons per twelve (12) consecutive month period, total, with the compliance determined at the end of each month.

HAP: QUARTER: YEAR:

Month	Single HAP Usage (tons)	Single HAP Usage (tons)	Single HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Galbreath, Inc.
 Source Address: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
 Mailing Address: P.O. Box 2678, Lakeland, FL 33840
 FESOP No.: F 131-22924-00004
 Facility: Six (6) surface coating paint booths in Plants 2 East and 2 West (Booth 1a, Booth 1b, Booth 2a, Booth 2b, Booth 3a and Booth 3b)
 Parameter: Total combined HAPs delivered to the applicators, plus total combined HAPs in cleanup solvents used
 Limit: Less than 24.0 tons per twelve (12) consecutive month period, total, with the compliance determined at the end of each month.

QUARTER: YEAR:

Month	Total HAP Usage (tons)	Total HAP Usage (tons)	Total HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Galbreath, Inc.
Source Address: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
Mailing Address: P.O. Box 2678, Lakeland, FL 33840
FESOP No.: F 131-22924-00004
Facility: One (1) surface coating paint booth in Plant 2 West (Booth 2b)
Parameter: VOC delivered to the applicators, plus VOC in cleanup solvent used
Limit: Less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

QUARTER: YEAR:

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Galbreath, Inc.
Source Address: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
Mailing Address: P.O. Box 2678, Lakeland, FL 33840
FESOP No.: F 131-22924-00004

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

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

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

Addendum to the
Technical Support Document for a Federally Enforceable State Operating Permit
(FESOP) Renewal

Source Name: Galbreath Inc.
Source Location: US 35 and Rossier Drive, Winamac, IN 46996
County: Pulaski
SIC Code: 3444
Operation Permit No.: F 131-22924-00004
Permit Reviewer: Sarah Slack

On July 5, 2006, the Office of Air Quality (OAQ) had a notice published in the Pulaski Journal, Pulaski, Indiana, stating that Galbreath, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) renewal for a metal fabrication process producing solid waste handling equipment. The notice also stated that OAQ proposed to issue a FESOP renewal for this operation and provided information on how the public could review the proposed FESOP renewal 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 FESOP renewal should be issued as proposed.

Comments on the proposed FESOP renewal were received on August 16, 2006 from Chuck Kleinfehn of Galbreath Inc.

Changes to the permit are noted as follows: ~~struck~~ language has been deleted; **bold** language has been added.

Comment 1:

Change Plant #1 to Plant #2 East and change Plant #2 to Plant # 2 West. This is the way the buildings are labeled now.

Response 1:

The permit has been changed as follows:

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

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

- (a) Two (2) surface coating paint booths, located in ~~Plant 1~~ **Plant 2 East**, identified as Booth 1a and Booth 1b, constructed in 1968, utilizing the airless method of spraying and dry filters as control, exhausting to vent 1 (stacks 1 through 8), maximum capacity: 41.18 pounds of paint per hour and 4.24 pounds of solvents per hour, combined.
- (b) Two (2) surface coating paint booths, located in Plant 2 **West**, identified as Booth 2a and Booth 2b, constructed in 1978 and 1989, respectively, utilizing the airless method of spraying and dry filters as control, exhausting to vents 2a (stack 2) and 2b (stack 3), respectively, maximum capacity: 18.02 pounds of paint per hour and 2.25 pounds of solvents per hour, each.
- (c) Two (2) surface coating paint booths, located in Plant 2 **West**, identified as Booth 3a and Booth 3b, constructed in 2001, utilizing the electrostatic airless method of spraying and

dry filters as control, exhausting to vent 3a and vent 3b, respectively, maximum capacity: 79.18 pounds of primer per hour and 71.27 pounds of finish coat per hour, combined.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) surface coating paint booths, located in ~~Plant 1~~ **Plant 2 East**, identified as Booth 1a and Booth 1b, constructed in 1968, utilizing the airless method of spraying and dry filters as control, exhausting to vent 1 (stacks 1 through 8), maximum capacity: 41.18 pounds of paint per hour and 4.24 pounds of solvents per hour, combined.
- (b) Two (2) surface coating paint booths, located in Plant 2 **West**, identified as Booth 2a and Booth 2b, constructed in 1978 and 1989, respectively, utilizing the airless method of spraying and dry filters as control, exhausting to vents 2a (stack 2) and 2b (stack 3), respectively, maximum capacity: 18.02 pounds of paint per hour and 2.25 pounds of solvents per hour, each.
- (c) Two (2) surface coating paint booths, located in Plant 2 **West**, identified as Booth 3a and Booth 3b, constructed in 2001, utilizing the electrostatic airless method of spraying and dry filters as control, exhausting to vent 3a and vent 3b, respectively, maximum capacity: 79.18 pounds of primer per hour and 71.27 pounds of finish coat per hour, combined.

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

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (vent 1 (stacks 1 through 8 at ~~Plant 1~~ **Plant 2 East**), vent 2a (stack 2 at Plant 2 **West**), vent 2b (stack 3 at Plant 2 **West**), vent 3a and vent 3b) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE BRANCH

FESOP Quarterly Report

Source Name: Galbreath, Inc.
Source Address: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
Mailing Address: P.O. Box 2678, Lakeland, FL 33840
FESOP No.: F 131-22924-00004
Facility: Six (6) surface coating paint booths in ~~Plants 1~~ **Plants 2 East and 2 West** (Booth 1a, Booth 1b, Booth 2a, Booth 2b, Booth 3a and Booth 3b)
Parameter: VOC delivered to the applicators, plus VOC in cleanup solvents used
Limit: Less than 99.0 tons per twelve (12) consecutive month period, with the compliance determined at the end of each month.

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

FESOP Quarterly Report

Source Name: Galbreath, Inc.
Source Address: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
Mailing Address: P.O. Box 2678, Lakeland, FL 33840
FESOP No.: F 131-22924-00004
Facility: Six (6) surface coating paint booths in ~~Plants 1~~ **Plants 2 East and 2 West** (Booth 1a, Booth 1b, Booth 2a, Booth 2b, Booth 3a and Booth 3b)
Parameter: Single HAP delivered to the applicators, plus amount of that HAP in cleanup solvents used
Limit: Less than 9.0 tons per twelve (12) consecutive month period, total, with the compliance determined at the end of each month.

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

FESOP Quarterly Report

Source Name: Galbreath, Inc.
Source Address: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
Mailing Address: P.O. Box 2678, Lakeland, FL 33840
FESOP No.: F 131-22924-00004
Facility: Six (6) surface coating paint booths in ~~Plants 1~~ **Plants 2 East and 2 West** (Booth 1a, Booth 1b, Booth 2a, Booth 2b, Booth 3a and Booth 3b)
Parameter: Total combined HAPs delivered to the applicators, plus total combined HAPs in cleanup solvents used
Limit: Less than 24.0 tons per twelve (12) consecutive month period, total, with the compliance determined at the end of each month.

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

FESOP Quarterly Report

Source Name: Galbreath, Inc.
Source Address: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
Mailing Address: P.O. Box 2678, Lakeland, FL 33840
FESOP No.: F 131-22924-00004
Facility: One (1) surface coating paint booth in Plant **2 West** (Booth 2b)
Parameter: VOC delivered to the applicators, plus VOC in cleanup solvent used
Limit: Less than 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

OAQ Changes:

Upon further review, the OAQ has decided to make the following revisions:

On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.

Although the TSD itself will not be revised as it is a historical document and the TSD was correct at the time of public notice, the following is being provided to show how the county attainment status has been affected as a result of the revocation of the one-hour ozone standard.

County Attainment Status

The source is located in Pulaski County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1 hour Ozone	Attainment
8 hour Ozone	Attainment
CO	Attainment
Lead	Attainment
PM-2.5	Attainment

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

Technical Support Document (TSD) for a Renewal of a Federally Enforceable State
Operating Permit (FESOP)

Source Background and Description

Source Name:	Galbreath, Inc.
Source Location:	US 35 and Rossier Drive, Winamac, IN 46996
County:	Pulaski
SIC Code:	3444
Operation Permit No.:	131-14890-00004
Operation Permit Issuance Date:	December 31, 2001
Permit Renewal No.:	131-22924-00004
Permit Reviewer:	Sarah Slack

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Galbreath, Inc. relating to the operation of stationary metal fabrication process.

Source Definition

This Source Definition from the previous FESOP was incorporated into this permit as follows:

This metal fabrication process producing solid waste handling equipment consists of two (2) plants. Plants 1 and 2 are located on contiguous properties, have the same SIC codes and are owned by one (1) company. Therefore, they are considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

- (a) Two (2) surface coating paint booths, located in Plant 1, identified as Booth 1a and Booth 1b, constructed in 1968, utilizing the airless method of spraying and dry filters as control, exhausting to vent 1 (stacks 1 through 8), maximum capacity: 41.18 pounds of paint per hour and 4.24 pounds of solvents per hour, combined.
- (b) Two (2) surface coating paint booths, located in Plant 2, identified as Booth 2a and Booth 2b, constructed in 1978 and 1989, respectively, utilizing the airless method of spraying and dry filters as control, exhausting to vents 2a (stack 2) and 2b (stack 3), respectively, maximum capacity: 18.02 pounds of paint per hour and 2.25 pounds of solvents per hour, each.
- (c) Two (2) surface coating paint booths, located in Plant 2, identified as Booth 3a and Booth 3b, constructed in 2001, utilizing the electrostatic airless method of spraying and dry filters as control, exhausting to vent 3a and vent 3b, respectively, maximum capacity: 79.18 pounds of primer per hour and 71.27 pounds of finish coat per hour, combined.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. There are no boilers at this source. The insignificant combustion units have a combined maximum heat input capacity of 10.64 MMbtu/hr.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - (2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (e) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (f) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. Three (3) parts washers, using only non-halogenated solvents. [326 IAC 8-3-5] [326 IAC 8-3-2]
- (h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (i) Closed loop heating and cooling systems.
- (j) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (k) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (l) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.

Existing Approvals

The source has been operating under the previous FESOP 131-14890-00004 issued on December 31, 2001. All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have either been incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete FESOP renewal application for the purposes of this review was received on April 5, 2006.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A (pages 1 through 5) of this document for detailed emission calculations.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	143
PM-10	143
SO ₂	negligible
VOC	431
CO	3.91
NO _x	4.66

HAPs	Unrestricted Potential Emissions (tons/yr)
Xylenes	32.6
Toluene	23.0
MEK	34.5
MIBK	3.83
Ethyl Benzene	7.67
Methanol	7.67
Total	185.9

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (c) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP.

Process/emission unit	Potential To Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAPs	Combined HAPs
Booth 1a*	1.09	1.09	-	Less than 99	-	-	Less than 9.0	Less than 24.0
Booth 1b*	1.09	1.09	-		-	-		
Booth 2a*	0.48	0.48	-		-	-		
Booth 2b*	0.48	0.48	-		-	-		
Booth 3a*	0.47	0.47	-		-	-		
Booth 3b*	1.09	1.09	-		-	-		
Welding	0.73	0.73	-	-	-	-	-	-
Combustion	0.089	0.35	0.028	0.26	3.91	4.66	-	-
Degreaser	-	-	-	0.59	-	-	-	-
Total Emissions	Less than 100	Less than 100	0.028	Less than 100	3.91	4.66	Less than 10.0	Less than 25.0

"-" signifies negligible

* These emission units have limited emissions of PM10, VOC, single HAP, and combined HAPs in order to avoid Title V requirements.

County Attainment Status

The source is located in Pulaski County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1 hour Ozone	Attainment
8 hour Ozone	Attainment
CO	Attainment
Lead	Attainment
PM-2.5	Attainment

- (a) 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 emissions and NOx are considered when evaluating the rule applicability relating to ozone. Pulaski County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx 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.
- (b) Pulaski County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (c) Pulaski County has been classified as attainment or unclassifiable 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, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	Less than 100
PM-10	Less than 100
SO ₂	0.028
VOC	Less than 100
CO	3.91
NO _x	4.66
Single HAP	Less than 10.0
Combination HAPs	Less than 25.0

This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.

Federal Rule Applicability

- (a) There no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
 - (1) The storage capacity of each of the tanks at this source is less than the applicability threshold capacities established in 40 CFR 60 subparts K, Ka, and Kb. Therefore, these requirements are not included in this permit.
- (b) 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.
 - (1) The surface coating booths are not subject to the requirements of 40 CFR 63 subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface

Coating of Miscellaneous Metal Parts and Products) because the source has limited HAP emissions in a manner such that the source is not a major source for HAPs (See 326 IAC 2-8 FESOP below).

- (2) The Degreasing Operations are not subject to 40 CFR 63 subpart T (National Emission Standards for Halogenated Solvent Cleaning) because this source does not use halogenated solvents.
 - (3) The combustion units are not subject to 40 CFR 63 subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters) because this source is not a major source for HAPs and the combustion sources are not boilers or process heaters.
- (d) This source is not required to obtain a part 70 permit. Therefore, 40 CFR 64 (Compliance Assurance Monitoring) is not included in this permit.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source which was constructed in 1968, and has had no major modifications, is not subject to the requirements of 326 IAC 2-2 because the potential to emit of all criteria pollutants except VOC are less than 250 tons per year. The potential to emit of VOC is limited to less than 250 tons per year (See FESOP limitations below).

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

The source is not subject to the requirements of 326 IAC 2-4.1 because the potential to emit any single HAP is limited to less than 10 tons per year and the potential to emit any combination of HAPs is limited to less than 25 tons per year (see FESOP limitations below). Furthermore Booth 1a, Booth 1b and Booth 2a were constructed before July 27, 1997, the applicability date of this rule. In addition, if this were a major source of HAPs it would be subject to the requirements of 40 CFR 63 subpart MMMM. Therefore, it would not be subject to the requirements of 326 IAC 2-4.1.

326 IAC 2-6 (Emission reporting)

The source is not subject to the requirements of 326 IAC 2-6 because this source is located in Pulaski county and is not required to have an operating permit under 326 IAC 2-7 and does not emit lead into the ambient air at levels equal to or greater than 5 tons per year (See FESOP limitations below).

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM₁₀, SO₂, VOC, CO and NO_x emitted shall be less than one hundred (100) tons per year. In addition, the amount of a single HAP emitted shall be less than ten (10) tons per year and the combination of all HAPs emitted shall be less than twenty-five (25) tons per year. The potential to emit PM₁₀ and VOC are each greater than 100 tons per year. In addition, the potential to emit of a single HAP is greater than 10 tons per year and the potential to emit any combination of HAPs is greater than 25 tons per year. Therefore, the following emission limitations are necessary to render their requirements of 326 IAC 2-7 not applicable:

- (a) The total amount of VOC delivered to the applicators, plus VOC in cleanup solvents used, at the six (6) surface coating paint booths in Plants 1 and 2 (Booth 1a, Booth 1b, Booth 2a, Booth 2b, Booth 3a and Booth 3b) shall be limited to less than 99.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit, in combination with the uncontrolled potential to emit VOC of insignificant activities, will limit the potential to emit VOC from the entire source to less than 100 tons per year.
- (b) HAP emissions shall be limited as follows:

- (1) The total amount of any single HAP delivered to the applicators, plus HAP in the cleanup solvents used, at the six (6) surface coating paint booths in Plants 1 and 2 (Booth 1a, Booth 1b, Booth 2a, Booth 2b, Booth 3a and Booth 3b) shall be limited to less than 9.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit in combination with uncontrolled single HAP from insignificant activities, will limit the potential to emit single HAP from the entire source to less than 10 tons per year.
- (2) The combination of HAPs delivered to the applicators, plus HAPs in cleanup solvents used, at the six (6) surface coating paint booths in Plants 1 and 2 (Booth 1a, Booth 1b, Booth 2a, Booth 2b, Booth 3a and Booth 3b) shall be limited to less than 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit in combination with uncontrolled combined HAPs from insignificant activities, will limit the potential to emit combined HAPs from the entire source to less than 25 tons per year.
- (c) The PM10 emissions shall be controlled by dry particulate filters pursuant to 326 IAC 6-3-2. This requirement in combination with uncontrolled PM10 from insignificant activities, will limit the potential to emit PM10 emissions from the entire source to less than 100 tons per year.

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 this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) 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 8-6 (Organic Solvent Emissions Limitations)

The source is not subject to 326 IAC 8-6 because it is located in Pulaski County and commenced construction prior to 1974.

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Particulate Emission Limitations)

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

326 IAC 6-3-2 (Particulate Emission Limitations)

The welding operations are subject to 326 IAC 6-3-2(e) because greater than 625 pounds per day of wire is consumed and it is not a process regulated by 326 IAC 6-3-2(b) through (d). Based on the following equation and process weight rate of 0.015 tons per hour, the particulate emissions shall not exceed 0.25 pounds per hour.

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

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

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

The source complies with this emission limitation without the use of a control device.

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

- (a) Three (3) of the surface coating paint booths, Booth 1a, Booth 1b and Booth 2a, were constructed in 1968, 1968 and 1978, respectively, in Pulaski County. Since these facilities were constructed prior to January 1, 1980, and are not located in any of the specific counties mentioned under 326 IAC 8-2-1(a)(1), the requirements of 326 IAC 8-2-9 are not applicable.
- (b) One (1) surface coating booth, Booth 2b, was constructed in 1989. It has a potential to emit greater than 25 tons per year of VOC. Pursuant to T 131-7468-00004, issued on September 24, 1998, the amount of VOC delivered to the applicators, plus VOC in cleanup solvents used, at the one (1) surface coating paint booth, Booth 2b, is limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the potential to emit VOC is less than twenty-five (25) tons per year, and the requirements of 326 IAC 8-2-9 are not applicable to this facility.
- (c) Two (2) surface coating booths, Booth 3a and Booth 3b, were constructed in 2001 and have a potential to emit greater than twenty five (25) tons per year and fifteen (15) pounds per day each. Therefore pursuant to 326 IAC 8-2-1(a)(2) and (4), 326 IAC 8-2-9 applies to Booth 3a and Booth 3b. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators at the two (2) surface coating paint booths, identified as Booth 3a and Booth 3b, shall be limited to 3.5 pounds of VOC per gallon of coating less water, for air dried coatings.

Pursuant to 326 IAC 8-2-9(f), 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, the spray booths are in compliance with this requirement.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

- (a) Three of the surface coating paint booths, Booth 1a, Booth 1b and Booth 2a, were constructed prior to January 1, 1980. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to these booths.
- (b) The potential to emit VOC from one (1) surface coating paint booth, Booth 2b, constructed in 1989, is limited to less than twenty-five (25) tons per year and Booth 2b would otherwise be subject to 326 IAC 8-2-9 (See 326 IAC 8-2-9 discussion above). Therefore, the requirements of 326 IAC 8-1-6 are not applicable to these booths.
- (c) The two (2) surface coating paint booths, identified as Booth 3a and Booth 3b, are subject to 326 IAC 8-2-9. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to these booths.

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

The three (3) insignificant parts washers, which are cold cleaning operations, were constructed after January 1, 1980 in Pulaski county. Therefore, they are subject to the requirements of 326 IAC 8-3-2. The owner or operator of a cold cleaning facility 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 operating requirements; and
- (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 Degreaser Operation and Control)

The three (3) insignificant parts washers, which are cold cleaner operations, were constructed after July 1, 1990, and do not have remote solvent reservoirs. Therefore, they are subject to the requirements of 326 IAC 8-3-5.

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32)

millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

There are no testing requirements included in this permit. The source demonstrates compliance with VOC limits through record keeping and reporting. This source demonstrates compliance with PM10 limits through compliance monitoring and there is no single emission unit that emits a significant portion of PM10.

Compliance Requirements

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

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

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

The Spray Booths (Booth 1a, Booth 1b, Booth 2a, Booth 2b, Booth 3a, and Booth 3b) have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (vent 1 (stacks 1 through 8 at Plant 1), vent 2a (stack 2 at Plant 2), vent 2b (stack 3 at Plant 2), vent 3a and vent 3b) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary to demonstrate compliance with 326 IAC 2-8-4 and 326 IAC 6-3-2.

Conclusion

The operation of this metal fabrication source shall be subject to the conditions of the FESOP Renewal 131-22924-00004.

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

Company Name: Galbreath, Inc.
Address City IN Zip: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
FESOP: 131-22924
Pit ID: 131-00004
Reviewer: Sarah Slack

Existing Operations

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Material Usage (lbs/hr)	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 (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Booth 1a and Booth 1b															
Red Oxide Primer	10.92	32.05%	0.0%	32.1%	0.0%	47.00%	41.18	3.50	3.50	13.20	7602.46	57.81	30.64	7.45	75%
Brown H/S Hap-Free Enamel	8.34	41.97%	0.0%	42.0%	0.0%	55.30%	41.18	3.50	3.50	17.28	9954.30	75.69	26.17	6.33	75%
Red H/S HAP-Free Acrylic Enamel	8.08	43.32%	0.0%	43.3%	0.0%	61.50%	41.18	3.50	3.50	17.84	10274.61	78.13	25.56	5.69	75%
Beige H/S HAP-Free Enamel	8.68	40.32%	0.0%	40.3%	0.0%	49.90%	41.18	3.50	3.50	16.60	9564.39	72.73	26.91	7.01	75%
Worst Case Solvent (Aromatic 100)	7.34	100.00%	0.0%	100.0%	0.0%	0.00%	4.24	7.34	7.34	4.24	2442.24	18.57	0.00	n/a	75%
Booth 2a															
Red Oxide Primer	10.92	32.05%	0.0%	32.1%	0.0%	47.00%	18.02	3.50	3.50	5.78	3326.77	25.30	13.41	7.45	75%
Brown H/S Hap-Free Enamel	8.34	41.97%	0.0%	42.0%	0.0%	55.30%	18.02	3.50	3.50	7.66	4355.91	33.12	11.45	6.33	75%
Red H/S HAP-Free Acrylic Enamel	8.08	43.32%	0.0%	43.3%	0.0%	61.50%	18.02	3.50	3.50	7.81	4496.08	34.19	11.18	5.69	75%
Beige H/S HAP-Free Enamel	8.68	40.32%	0.0%	40.3%	0.0%	49.90%	18.02	3.50	3.50	7.27	4185.29	31.83	11.78	7.01	75%
Worst Case Solvent (Aromatic 100)	7.34	100.00%	0.0%	100.0%	0.0%	0.00%	2.25	7.34	7.34	2.25	1296.00	9.86	0.00	n/a	75%
Booth 2b															
Red Oxide Primer	10.92	32.05%	0.0%	32.1%	0.0%	47.00%	18.02	3.50	3.50	5.78	3326.77	25.30	13.41	7.45	75%
Brown H/S Hap-Free Enamel	8.34	41.97%	0.0%	42.0%	0.0%	55.30%	18.02	3.50	3.50	7.66	4355.91	33.12	11.45	6.33	75%
Red H/S HAP-Free Acrylic Enamel	8.08	43.32%	0.0%	43.3%	0.0%	61.50%	18.02	3.50	3.50	7.81	4496.08	34.19	11.18	5.69	75%
Beige H/S HAP-Free Enamel	8.68	40.32%	0.0%	40.3%	0.0%	49.90%	18.02	3.50	3.50	7.27	4185.29	31.83	11.78	7.01	75%
Worst Case Solvent (Aromatic 100)	7.34	100.00%	0.0%	100.0%	0.0%	0.00%	2.26	7.34	7.34	2.26	1296.00	9.86	0.00	n/a	75%
Potential Emissions							PM	Control Efficiency	99.00%						
								Uncontrolled		42.2	24301	185	57.5		
								Controlled		42.2	24301	185	0.575		

Add worst case coating to all solvents

METHODOLOGY

Pounds of VOC per Gallon Coating less Water provided by the coating supplier.
 Potential VOC Pounds per Hour = Material Usage (lbs/hr) x Weight % Organics
 Potential VOC Pounds per Day = Material Usage (lbs/hr) x Weight % Organics x 24 hrs/day
 Potential VOC Tons per Year = Material Usage (lbs/hr) x Weight % Organics x 8,760 hrs/yr x 1 ton/2,000 lbs
 Particulate Potential Tons per Year = Material Usage (lbs/hr) x (1 - Weight % Organics) x 8,760 hrs/yr x 1 ton/2,000 lbs
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 Total = Worst Coating + Worst Case Solvent

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

Company Name: Galbreath, Inc.
 Address City IN Zip: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
 FESOP: 131-22924
 Pit ID: 131-00004
 Reviewer: Sarah Slack

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Material Usage (lbs/hr)	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 (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Booth 3a															
Red Oxide Primer	10.92	32.05%	0.0%	32.1%	0.0%	47.00%	79.18	3.50	3.50	25.38	609.08	111.16	47.13	7.45	80%
Booth 3b															
Brown H/S Hap-Free Enamel	8.34	41.85%	0.0%	41.8%	0.0%	55.30%	71.27	3.49	3.49	29.82	715.78	130.63	36.31	6.31	80%
Red H/S HAP-Free Acrylic Enamel	8.08	43.19%	0.0%	43.2%	0.0%	61.50%	71.27	3.49	3.49	30.78	738.81	134.83	35.47	5.67	80%
Beige H/S HAP-Free Enamel	8.68	40.21%	0.0%	40.2%	0.0%	49.90%	71.27	3.49	3.49	28.66	687.74	125.51	37.33	6.99	80%
Cleanup															
Acetone	6.59	0.00%	0.0%	0.0%	0.0%	0.00%	n/a	0.00	0.00					n/a	80%
Potential Emissions							PM	Control Efficiency		56.2	1348	246	84.5		
								Uncontrolled		56.2	1348	246	0.845		
								Controlled							

Add worst case coating to all solvents

METHODOLOGY

Pounds of VOC per Gallon Coating less Water provided by the coating supplier.
 Potential VOC Pounds per Hour = Material Usage (lbs/hr) x Weight % Organics
 Potential VOC Pounds per Day = Material Usage (lbs/hr) x Weight % Organics x 24 hrs/day
 Potential VOC Tons per Year = Material Usage (lbs/hr) x Weight % Organics x 8,760 hrs/yr x 1 ton/2,000 lbs
 Particulate Potential Tons per Year = Material Usage (lbs/hr) x (1 - Weight % Organics) x 8,760 hrs/yr x 1 ton/2,000 lbs
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 Total = Worst Coating + Worst Case Solvent

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Galbreath, Inc.
Address City IN Zip: U.S. 35 and Rosser Drive, Winamac, Indiana 46996
FESOP: 131-22924
Pit ID: 131-00004
Reviewer: Sarah Slack

Material	Density (lbs/gal)	Maximum Material Usage (lbs/hr)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % MIBK	Weight % Ethyl Benzene	Weight % Methanol	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MEK Emissions (tons/yr)	MIBK Emissions (tons/yr)	Ethyl benzene Emissions (tons/yr)	Methanol Emissions (tons/yr)	Total HAP Emissions (tons/yr)
Solvents							Benzene								
VM&P Naphtha (67-55)	6.17	8.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Acetone	6.59	8.75	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Xylene (94)	7.25	8.75	85.00%	0.00%	0.00%	0.00%	15.00%	0.00%	32.58	0.00	0.00	0.00	5.75	0.00	38.33
Lacquer Thinner	7.07	8.75	70.00%	11.00%	0.00%	0.00%	0.00%	0.00%	26.83	4.22	0.00	0.00	0.00	0.00	31.04
Aromatic 100	7.34	8.75	1.00%	0.00%	90.00%	0.00%	1.00%	0.00%	0.38	0.00	34.49	0.00	0.38	0.00	35.26
Lac Th 11-155-1	7.00	8.75	0.00%	60.00%	10.00%	0.00%	0.00%	20.00%	0.00	23.00	3.83	0.00	0.00	7.67	34.49
Solvent 100	7.26	8.75	4.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.53	0.00	0.00	0.00	0.00	0.00	1.53
VM&P Naphtha (66733)	6.26	8.75	7.00%	0.00%	0.00%	10.00%	1.00%	0.00%	2.68	0.00	0.00	3.83	0.38	0.00	6.90
Xylene (66800)	7.18	8.75	80.00%	0.00%	0.00%	0.00%	20.00%	0.00%	30.66	0.00	0.00	0.00	7.67	0.00	38.33
Total									32.6	23.0	34.5	3.83	7.67	7.67	185.9

METHODOLOGY

Coatings used in calculating emissions contain no HAPs
HAPS emission rate (tons/yr) = Maximum Material Usage (lbs/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: Galbreath, Inc.
Address City IN Zip: U.S. 35 and Rosser Drive, Winamac, IN 46996
Permit Number: 131-22924
Pit ID: 131-00004
Reviewer: Sarah Slack
Date: 11-Apr-06

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
WELDING												
Metal Inert Gas (MIG)(carbon steel)	3028		0.0055	0.0005				0.167	0.015	0.000	0	0.015
EMISSION TOTALS												
Potential Emissions lbs/hr								0.17				0.02
Potential Emissions lbs/day								4.00				0.36
Potential Emissions tons/year								0.73				0.07

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

Using AWS average values: $(0.25 \text{ g/min}) / (3.6 \text{ m/min}) \times (0.0022 \text{ lb/g}) / (39.37 \text{ in./m}) \times (1,000 \text{ in.}) = 0.0039 \text{ lb/1,000 in. cut, 8 mm thick}$

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs
Welding and other flame cutting emission factors are from an internal training session document, "Welding and Flame Cutting". Refer to AP-42, Chapter 12.19 for additional emission factors for welding.