



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Rob Girton
Dragon/ESP-Midwest, Ltd.
8857 E. SR 14
Akron, Indiana 46910

June 27, 2006

Re: Interim Significant Permit Revision Petition
049-230391-00008

Dear Mr. Girton:

On June 1, 2006, the Office of Air Quality (OAQ) received an interim significant permit revision petition from Dragon/ESP-Midwest, Ltd. (Dragon), located at 8857 E. SR 14, Akron, Indiana for construction of a spray booth to be added to the existing surface coating operation. Particulate emissions will be controlled by a dry filter with 90% control efficiency, and VOC and HAPS from the new booth will be limited by the existing source-wide FESOP limits.

Public notice of the interim significant permit revision petition was published on June 3, 2006. The public comment period ended on June 17, 2006. There were no comments received. Pursuant to 326 IAC 2-13-1(i), the interim significant permit revision petition is in effect immediately upon signing, and expires on the effective date of the final significant permit revision permit. The interim significant permit revision petition may be revoked after this effective date upon a written finding by the Indiana Department of Environmental Management (IDEM) that any of the reasons for denial in 326 IAC 2-13-1(h) exist or if the final significant permit revision permit is denied. The IDEM has reviewed this interim significant permit revision petition and has not found any such reason. The facilities specified in the interim significant permit revision petition may not operate until the final significant permit revision permit is issued by OAQ.

The interim significant permit revision petition is federally enforceable. Detailed construction and operation conditions will be specified in the final significant permit revision permit 049-230391-00008.

If you have any questions regarding this interim significant permit revision petition, please contact Vickie Cordell of my staff at 317-233-1782, or at 1-800-451-6027 (ask for extension 3-1782).

Sincerely,

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

vkC

Enclosure: Interim Permit Evaluation (3 pages)
Petition for Interim Significant Permit Revision
cc: File - Fulton County
Fulton County Health Department
Northern Regional Office - David North
Doug Fierce, Dragon/ESP-Midwest, Ltd.
John Kilmer, BCA Consultants, Inc.

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

**Interim Significant Permit Revision
Evaluation Sheet**

Company Name: Dragon/ESP-Midwest, Ltd.	
Location: 8857 E. SR 14, Akron, IN 46910	Permit No: 049-23039I-00008
Permit Reviewer: Vickie Cordell	Date Receipt of Application: 06-01-2006 Date of review: 06-07-2006
Description of the interim construction: Add a second paint booth to the existing surface coating operation. Particulate emissions will be controlled by a dry filter with 90% removal efficiency, and VOC and HAPS from the new booth will be limited by the existing source-wide FESOP limits.	
Public Notice Date + 17 days = 06-20-2006	
Date the Application was received + 19 days = 06-20-2006	

Interim Petition Applicability: 326 IAC 2-13-1

- (a) Existing Source with valid permit;
- (b) Exemptions:
- (1) construction of a PSD source or PSD modification;
 - (2) construction or modification in nonattainment area that would emit those pollutants for which the nonattainment designation is based.
 - (3) any modification subject to 326 IAC 2-4.1.
- (3) Public notice comment period is 14 calendar days.

Instructions: Check () appropriate answers and make a recommendation.

1. Did the applicant submit a written petition for an interim permit?
 Yes Go to question 2.
 No Ignore verbal request.
2. Did the applicant pay the \$500 interim permit fee?
 Yes Go to question 3.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(1).
3. Did the applicant state acceptance of federal enforceability of an interim permit?
 Yes Go to question 4.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(D).
4. Did the applicant or its authorized agent sign the application?
 Yes Go to question 5.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(E).
5. Did the applicant submit a notarized affidavit stating that the applicant will proceed at its own risk (if the interim permit is issued), including, but not limited to:
 - (a) Financial risk,
 - (b) Risk that additional emission controls may be required,
 - (c) Risk that the final permit may be denied. Yes Go to question 6.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(F).

6. Did the applicant begin construction prior to submitting the interim permit application?
 Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(6).
 No Go to question 7.
7. What is the type of the interim construction?
 New Source Deny the application, pursuant to 326 IAC 2-13-1(a)
 Modification to an existing source Go to question 8.
8. Did the applicant present data in the interim permit that is sufficient to determine PSD, NSPS, NESHAP, and state rule compliance?
 Yes Go to question 9.
 No Deny the application pursuant to:
326 IAC 2-13-1(c)(2)(B), for PSD ;
326 IAC 2-13-1(c)(2)(C), for NSPS or NESHAP;
326 IAC 2-13-1(c)(2)(C), for state rules.
9. Is the proposed modification to be located in a nonattainment area?
 Yes Go to question 10.
 No Go to question 11. County: Fulton County
10. Will the proposed modification emit the pollutant for which the area is nonattainment in quantities greater than the significant levels?
 Yes Deny the application, pursuant to 326 IAC 2-13-1(a)(2).
 No Go to question 11.
11. Did the petition include a complete description of the process?
 Yes Go to question 12.
 No Deny the petition, pursuant to 326 IAC 2-13-1(c)(2).
12. Did the interim permit petition contain conditions accepting either emission controls (baghouse, afterburners, scrubbers, etc.) or enforceable limits or other suitable restriction to avoid PSD applicability; as well as control parameters (incinerator operating temperature, baghouse pressure drop, etc.)? The specific limits must be explicitly spelled out (i.e.: The gas consumption of the boiler shall not exceed 29 million cubic feet per month.) A statement such as that the company agrees to conditions such that PSD rules are not applicable is not acceptable.
 Yes Go to question 13.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).
13. Do the emission controls and/or throughput limits prevent PSD applicability?
 Yes Go to question 14.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(B).
14. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable New Source Performance Standards (NSPS) (40 CFR 60)?
 Yes Go to question 15.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
15. Will the modification, after application of all emission controls and/or throughput limitations comply with all applicable National Emission Standards for Hazardous Air Pollutants (NESHAP)?
 Yes Go to question 16.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
16. Will the modification, after application of all emission controls and/or throughput limitations, comply with all applicable state rules?
 Yes Go to question 17.
 No Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).

17. Does the applicant dispute applicability of any applicable state or federal rule?
 Yes Deny the application, pursuant to 326 IAC 2-13-1(c)(2)(C).
 No Go to question 18.
18. Is there good reason to believe that the applicant does not intend to construct in accordance with the interim permit petition?
 Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(1).
 No Go to question 19.
19. Is there good reason to believe that information in the petition has been falsified?
 Yes Deny the application, pursuant to 326 IAC 2-13-1(h)(7).
 No Approve the interim permit petition.
20. Has the petition been adequately public noticed? A proof of publication copy is necessary.
 Yes Go to question 21.
 No Deny the application, pursuant to 326 IAC 2-13-1(e).

Newspaper: Rochester Sentinel, Rochester, IN

Date of publication: 06-03-2006

21. Were comments received within seventeen (17) days after the public notice of the interim permit? (14 calendar days for comment period + 3 working days for mailing)
 Yes Evaluate the comments received, and make a recommendation.
 No Issue the final interim permit approval.

Comments:

Recommendation: **Approve Interim Petition**

Date the applicant was informed of the decision: 6/20/2006

Method of informing the applicant: telephone