



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant
DATE: January 7, 2008
RE: G.F. Munich Welding Co., LLC / 019-23666-00075
FROM: Matthew Stuckey, Deputy Branch 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, Suite N 501E, 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.dot12/03/07



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

**G.F. Munich Welding Co., LLC
211 Eastern Blvd.
Jeffersonville, Indiana 47130**

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

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.

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.

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.

| | |
|--|----------------------------------|
| Operation Permit No.: F019-23666-00075 | |
| Issued by: | Issuance Date: January 7, 2008 |
| Original signed by: Chrystal Wagner, Section Chief Permits Branch Office of Air Quality | Expiration Date: January 7, 2018 |

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 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 steel tank manufacturing source.

| | |
|------------------------------|--|
| Source Address: | 211 Eastern Blvd., Jeffersonville, Indiana 47130 |
| Mailing Address: | 211 Eastern Blvd., Jeffersonville, IN 47130 |
| General Source Phone Number: | (812)282-0488 |
| SIC Code: | 3441 & 3449 |
| County Location: | Clark |
| Source Location Status: | Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants |
| Source Status: | Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories |

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

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

- (a) One (1) spray paint room, known as EU1, equipped with dry filters for PM control, capacity: 0.18 tanks per hour, 4.0 beams per hour.
- (b) One (1) abrasive media blast room, known as EU2, equipped with two water wash control systems for PM control, capacity: 21,200 pounds per hour.
- (c) One (1) mechanical blaster, known as EU3, equipped with a baghouse for PM control capacity: 25,000 pounds per hour.

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:

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment. [326 IAC 6.5-1]
- (b) Structural steel fabrication activities using 80 tons or less of welding consumables. [326 IAC 6.5-1]
- (c) Two (2) abrasive media storage silo with particulate matter emissions less than 5 pounds per hour of 25 pounds per day. [326 IAC 6.5-1]
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (e) Machining where an aqueous cutting coolant continuously floods the machining interface.

- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (g) Paved and unpaved roads and parking lots with public access.

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, F019-23666-00075, is issued for a fixed term of ten (10) 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 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 April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
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.10 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.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
MC 61-53 IGCN 1003
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 F019-23666-00075 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
MC 61-53 IGCN 1003
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(c)]

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
MC 61-53 IGCN 1003
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
MC 61-53 IGCN 1003
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
MC 61-53 IGCN 1003
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, on a rolling five (5) year basis, which document 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 Source Modification 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][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a 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
MC 61-53 IGCN 1003
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 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.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 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. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.
- (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.2 Opacity [326 IAC 5-1]

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

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

C.3 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.4 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.5 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.6 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.7 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

MC 61-52 IGCN 1003
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.

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

C.8 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
MC 61-53 IGCN 1003
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.9 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.10 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
MC 61-53 IGCN 1003
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.11 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.12 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 of the parameters.

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

C.13 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.14 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 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.15 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.16 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

MC 61-53 IGCN 1003
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.
- (f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.17 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

FACILITY OPERATION CONDITIONS

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

- (a) One (1) spray paint room, known as EU1, equipped with dry filters for PM control, capacity: 0.18 tanks per hour, 4.0 beams per hour.

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

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

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

The total volatile organic compound (VOC) delivered to the coating applicators at the one (1) spray paint room (EU1), plus the VOC used for cleanup, shall be less than 99 tons per consecutive twelve (12) month period with compliance determined at the end of each month. This will limit the source-wide emissions of VOC to less than one hundred (100) tons per consecutive twelve (12) month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) are not applicable.

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

- (a) The worst case single HAP delivered to the coating applicators at the one (1) spray paint room (EU1), plus amount of that HAP used for cleanup shall be less than 10.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit source-wide emissions of a single HAP to less than 10.0 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 are not applicable.
- (b) The combination of HAPs delivered to the coating applicators at the one (1) spray paint room (EU1), plus the total HAPs used for cleanup shall be less than 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit source-wide emissions of combined HAP to less than 25.0 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 are not applicable.

D.1.3 Particulate [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

- (a) The coatings applied by the spray paint room EU1 shall be limited such that total PM emissions shall not exceed 70.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The coatings applied by the spray paint room EU1 shall be limited such that the total PM10 emissions shall not exceed 70.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The transfer efficiency at the spray paint room EU1 shall not be less than 75%.
- (d) The control efficiency of the dry filters on the spray paint room EU1 shall not be less than 31%.

Compliance with these limits will render the requirements of 326 IAC 2-2 not applicable with

respect to PM and PM10.

D.1.4 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations except Lake County), PM emissions from the one (1) spray paint room (EU1) shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of the one (1) spray paint room (EU1), used for coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating excluding water, for forced warm air dried coatings.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up 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.

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 these facilities and any control devices.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC) and HAP

Compliance with the VOC and HAP usage and content limitations contained in Conditions D.1.1, D.1.2, and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 Particulate Matter (PM)

In order to comply with Conditions D.1.3 and D.1.4, the one (1) spray paint room (EU1) shall be controlled by dry filters at all times that the one (1) spray paint room (EU1) is in operation.

D.1.9 Particulate Matter (PM/PM10) Emissions Determination [326 IAC 2-2]

Compliance with Conditions D.1.3 shall be determined by calculating the PM/PM10 emissions associated with each coating applied by the spray paint room EU1 using the following equation:

$$PM/PM10 = (\sum CU \times D \times W\%S) \times (1-TE/100) \times (1-CE/100) \times 1/2000$$

Where:

PM/PM10 = The total PM/PM10 emissions (ton/month) for all coatings.

CU = The total coating use (gal coating/month) of each coating.

D = The density (lb coating/gal coating) of each coating.

W%S = The weight percent solids (lb solids/lb coating) of each coating.

TE = The transfer efficiency (%) of the spray applicators. This value shall

equal 75% unless an IDEM approved test is conducted, in which case the value shall equal that determined from the most recent IDEM approved test.

CE = The control efficiency (%) of the dry filters. This value shall equal 31% unless an IDEM approved test is conducted, in which case the value shall equal that determined from the most recent IDEM approved test.

The total PM/PM10 emissions (ton/month) from the spray paint room EU1 is equal to the sum of the PM/PM10 emissions associated with each coating applied by the spray paint room EU1.

D.1.10 Testing Requirements [326 IAC 2-1.1-11]

- (a) No later than 180 days after issuance of F019-23666-00075, the Permittee shall conduct transfer efficiency testing on the one (1) spray paint room, known as EU1, subject to Condition D.1.3. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C – Performance Testing.
- (b) No later than 180 days after issuance of F019-23666-00075, the Permittee shall conduct control efficiency testing on the dry filters used by the one (1) spray paint room, known as EU1, subject to Condition D.1.3. Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C – Performance Testing.

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

D.1.11 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 one (1) spray paint room (EU1) stack while the booth is in operation. If a condition exists which would 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 stack and the presence of overspray on the rooftops and/or 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, D.1.3 and D.1.5, 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, HAP, and PM/PM10 usage and emission limits established in Conditions D.1.1, D.1.2, D.1.3 and D.1.5.
 - (1) The amount and VOC, HAP and solids content of each coating material and

solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC, total solids, individual HAP and total HAP usage for each month;
 - (5) The weight of VOCs, PM and PM₁₀, individual HAPs and total HAPs emitted for each compliance period;
- (b) To document compliance with Condition D.1.11, 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.1.13 Reporting Requirements

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

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Abrasive media and Mechanical Blasting

- (b) One (1) abrasive media blast room, known as EU2, equipped with two water wash control systems for PM control, capacity: 21,200 pounds per hour.
- (c) One (1) mechanical blaster, known as EU3, equipped with a baghouse for PM control capacity: 25,000 pounds per hour.

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

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

D.2.1 PM₁₀ Emission Limitation [326 IAC 2-8-4]

- (a) The PM₁₀ emissions from the abrasive media blast room, known as EU2, shall not exceed 4.00 pounds per hour.
- (b) The PM₁₀ emissions from the mechanical blaster, known as EU3, shall not exceed 0.34 pounds per hour.

Compliance with the above limits will limit source-wide emissions of PM₁₀ to less than 100 tons per year. Compliance with these FESOP limits will render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.2.2 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations except Lake County), PM emissions from the media blast room, known as EU2, and the mechanical blaster, known as EU3, shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

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

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

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

- (a) In order to comply with conditions D.2.1 and D.2.2, the water wash control system for PM control shall be in operation and control emissions from the abrasive media blast room, known as EU2, at all times that the abrasive media blast room is in operation.
- (b) In order to comply with conditions D.2.1 and D.2.2, the baghouse for PM control shall be in operation and control emissions from the mechanical blaster, known as EU3, at all times that the mechanical blaster is in operation.

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

D.2.5 Monitoring

Daily inspections shall be performed to verify that the water level of the water wash control system for the abrasive media blast room, known as EU2, meet the manufacturer's recommended level. To monitor the performance of the water wash control system, the water

level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, daily observations shall be made of the visible emission from the abrasive media blast room (EU2) and mechanical blaster (EU3) stack exhausts while one or more of the emission units are in operation. If abnormal emissions are 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 the section mentioned above shall be considered a deviation from this permit.

D.2.6 Baghouse Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse used in conjunction with the mechanical blaster (EU3), at least once per day when the mechanical blaster is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (b) For a single compartment baghouse, controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (c) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain a log of daily visible emission notations of the abrasive media blast room (EU2) and mechanical blaster (EU3). The Permittee shall include in its daily record when a visible emission notation is

not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).

- (b) To document compliance with Condition D.2.5, the Permittee shall maintain a log of weekly observations of the water level in the pans, daily and weekly inspections.
- (c) To document compliance with Condition D.2.6, the Permittee shall maintain the following:
 - (1) Records of once per day pressure readings. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment. [326 IAC 6.5-1]
- (b) Structural steel fabrication activities using 80 tons or less of welding consumables. [326 IAC 6.5-1]
- (c) Two (2) abrasive media storage silos with particulate matter emissions less than 5 pounds per hour of 25 pounds per day. [326 IAC 6.5-1]

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

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

D.3.1 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations except Lake County), particulate matter (PM) emissions from the welding, structural steel fabrication and abrasive media storage facilities shall be limited to 0.03 grain per dry standard cubic foot of outlet air.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: G. F. Munich Welding Company
 Source Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
 Mailing Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
 FESOP No.: F 019-23666-00075
 Facility: Entire Source
 Parameter: HAP Usage
 Limit: Less than 10 tons per consecutive 12 month period of any single HAP
 Less than 25 tons per consecutive 12 month period of any combination of HAPs

YEAR:

| Month | Combination of HAPS (tons) | Combination of HAPS (tons) | Combination of HAPS (tons) |
|-------|----------------------------|----------------------------|----------------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

| Month | Worst Case Single HAP (tons) | Worst Case Single HAP (tons) | Worst Case Single HAP (tons) |
|-------|------------------------------|------------------------------|------------------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

- 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 DATA SECTION**

FESOP Quarterly Report

Source Name: G.F. Munich Welding Co., LLC
Source Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
Mailing Address: 211 Eastern Blvd., Jeffersonville, IN 47130
FESOP Permit No.: F019-23666-00075
Facility: EU1
Parameter: VOC Usage
Limit: Less than 99 tons per consecutive 12 month period

YEAR: _____

| Month | Column 1 | Column 2 | Column 1 + Column 2 |
|---------|------------|--------------------|---------------------|
| | 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 DATA SECTION**

FESOP Quarterly Report

Source Name: G. F. Munich Welding Company
Source Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
Mailing Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
FESOP No.: F 019-23666-00075
Facility: Spray paint room (EU1)
Parameter: PM/PM10 emissions (ton/month)
Limit: No more than 70.0 tons per consecutive twelve (12) month period

YEAR:

| Month | Coating Solids (tons) | Coating Solids (tons) | Coating Solids (tons) |
|-------|-----------------------|-----------------------|-----------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

- 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**

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

Source Name: G.F. Munich Welding Co., LLC
Source Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
Mailing Address: 211 Eastern Blvd., Jeffersonville, IN 47130
FESOP Permit No.: F019-23666-00075

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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

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

Source Name: G.F. Munich Welding Co., LLC
Source Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
Mailing Address: 211 Eastern Blvd., Jeffersonville, IN 47130
FESOP Permit No.: F019-23666-00075

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• 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) working 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 DATA SECTION
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: G.F. Munich Welding Co., LLC
 Source Address: 211 Eastern Blvd., Jeffersonville, Indiana 47130
 Mailing Address: 211 Eastern Blvd., Jeffersonville, IN 47130
 FESOP Permit No.: F019-23666-00075

Months: _____ **to** _____ **Year:** _____

| | |
|--|-------------------------------|
| <p>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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does 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@.</p> | |
| <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: | |

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 (ATSD)
for a
Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

| | |
|------------------------------|---|
| Source Name: | G. F. Munich Welding Co., LLC |
| Source Location: | 211 Eastern Blvd., Jeffersonville, Indiana 47130 |
| County: | Clark |
| SIC Code: | 3441 and 3449 |
| Operation Permit No.: | F 019-23666-00075 |
| Permit Reviewer: | Jeff Scull |

On November 29, 2007, the Office of Air Quality (OAQ) had a notice published in the Evening News in Jeffersonville, Clark County, IN, stating that G. F. Munich Welding Co., LLC had applied for the renewal of the FESOP permit at this steel tank manufacturing source. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

No comments on the proposed FESOP renewal were received as of January 2, 2008. The summary of the comments and corresponding responses are as follows (**bolded** language has been added and language ~~with a line through it~~ has been deleted):

OAQ Changes

OAQ has made the following changes to the permit to make the efficiency testing a one time only test, as follows:

D.1.10 Testing Requirements [326 IAC 2-1.1-11]

-
- (a) No later than 180 days after issuance of F019-23666-00075, the Permittee shall conduct transfer efficiency testing on the one (1) spray paint room, known as EU1, subject to Condition D.1.3. ~~This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.~~ Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C – Performance Testing.

 - (b) No later than 180 days after issuance of F019-23666-00075, the Permittee shall conduct control efficiency testing on the dry filters used by the one (1) spray paint room, known as EU1, subject to Condition D.1.3. ~~This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.~~ Testing shall be conducted using methods approved by the Commissioner and in accordance with 326 IAC 3-6-3 and Section C – Performance Testing.

On December 16, 2007, rule revisions to 326 IAC 2-1.1-9 and 326 IAC 2-8-4 were finalized allowing for ten (10) year permit terms on FESOP renewals. Condition B.2 has been revised to reflect the ten (10) year permit term.

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, F019-23666-00075, is issued for a fixed term of ~~five (5)~~ **ten (10)** 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.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

| | |
|------------------------------|---|
| Source Name: | G. F. Munich Welding Co., LLC |
| Source Location: | 211 Eastern Blvd., Jeffersonville, Indiana 47130 |
| County: | Clark |
| SIC Code: | 3441 and 3449 |
| Operation Permit No.: | F 019-23666-00075 |
| Permit Reviewer: | Jeff Scull |

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from G. F. Munich Welding Company relating to the operation of a steel tank manufacturing source.

History

On September 20, 2006, G. F. Munich Welding Co., LLC submitted an application to the OAQ requesting to renew its operating permit. On June 25, 2007 the source submitted additional information for the renewal. G. F. Munich Welding Co. LLC was issued its first FESOP Renewal on August 19, 2002. G. F. Munich Welding Co., LLC was issued an Administrative Amendment on November 18, 2004.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) spray paint room, known as EU1, equipped with dry filters for PM control, capacity: 0.18 tanks per hour, 4.0 beams per hour.
- (b) One (1) abrasive media blast room, known as EU2, equipped with a water wash control system for PM control, capacity: 21,200 pounds per hour.
- (c) One (1) mechanical blaster, known as EU3, equipped with a baghouse for PM control capacity: 25,000 pounds per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment

There are no new emission units proposed at this source during this review process. The source is making a change in work practices in the abrasive blasting room, known as EU2, to increase operator safety, but will not increase emissions. The source is adding a second exhaust port and wet collector to the abrasive blasting room, known as EU2. The source removed the degreasing operation.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment. [326 IAC 6.5-1]
- (b) Structural steel fabrication activities using 80 tons or less of welding consumables. [326 IAC 6.5-1]
- (c) Two (2) abrasive media storage silos with particulate matter emissions less than 5 pounds per hour of 25 pounds per day. [326 IAC 6.5-1]
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (e) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (g) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

Existing Approvals

Since the issuance of the FESOP F 019-14026-00075 on August 19, 2002, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. 019-19974-00075 issued on November 18, 2004.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous approvals are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document, pages 1 and 2, for detailed VOC and HAPs emissions calculations from surface coating. See Appendix A of this document, page 3, for detailed calculations of PM emissions from the abrasive media blasting and mechanical blasting processes. For the purposes of this FESOP, it is assumed that all PM = PM₁₀.

County Attainment Status

The source is located in Clark County.

| Pollutant | Status |
|-------------------|---------------------|
| PM ₁₀ | attainment |
| PM _{2.5} | basic nonattainment |
| SO ₂ | attainment |
| NOx | attainment |
| 8-hour Ozone | attainment |
| CO | attainment |
| Lead | attainment |

Note: On September 6, 2007 the Indiana Air Pollution Control Board finalized a temporary emergency rule to redesignate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph counties as attainment for the 8-hour ozone standard.

- (a) Clark County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone. Clark County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Clark County has been classified as attainment or unclassifiable in Indiana for all remaining 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 – Entire Source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

| Pollutant | tons/year |
|-----------------|-----------|
| PM | 299 |
| PM-10 | 299 |
| SO ₂ | 0.013 |
| VOC | 169 |
| CO | 1.84 |
| NO _x | 2.19 |

| HAPs | tons/year |
|------------------|-----------|
| Xylene | 63.7 |
| Dimethyl benzene | 53.3 |
| Ethyl benzene | 39.8 |
| Glycol Ethers | 15.4 |
| MIBK | 8.41 |
| Total | 181 |

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC and PM₁₀ is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their VOC and PM₁₀ emissions to less than Title V levels; therefore, the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) 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. However, the source has agreed to limit their single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP.
- (d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ emission data.

| Pollutant | Actual Emissions (tons/year) |
|-----------------|---|
| PM | No emission data received from the source |
| PM-10 | 13 |
| SO ₂ | No emission data received from the source |
| VOC | 5 |
| CO | No emission data received from the source |
| NO _x | No emission data received from the source |
| HAP (specify) | No emission data received from the source |

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.

| Process/ Emission Unit | Potential to Emit After Issuance (tons/year) | | | | | | |
|---------------------------|---|------------------|-----------------|---------------|------|-----------------|---|
| | PM | PM ₁₀ | SO ₂ | VOC | CO | NO _x | HAPs |
| Surface Coating (EU1) | 70.0 | 70.0 | - | Less than 99 | - | - | Single less than 10 Total less than 25 |
| Sand Blasting (EU2) | 17.5 | 17.5 | - | - | - | - | - |
| Blast Cleaning (EU3) | 1.50 | 1.50 | - | - | - | - | - |
| Insignificant Activities | 10.0 | 10.0 | 0.120 | Less Than 1.0 | 1.84 | 2.19 | neg |
| Total PTE After Issuance | 99.0 | 99.0 | 0.120 | Less than 100 | 1.84 | 2.19 | Single less than 10 Total less than 25 |

The PM₁₀ limit has been apportioned between the surface coating and blast cleaning operations in proportion to the magnitude of their uncontrolled PM₁₀ emissions. The PM₁₀ limit for surface coating will be enforced through a limitation of solids delivered to the applicators. The dry filters shall be in operation at all times the surface coating process is in operation, the water wash control system shall be in operation at all times the sand blasting process is in operation, and the baghouse shall be in operation at all times the blast cleaning process is in operation, in order to comply with these limits.

- (a) This existing stationary source is not major for nonattainment NSR because the emissions of PM₁₀ as a surrogate for the nonattainment pollutant PM_{2.5}, are less than one hundred (<100) tons per year.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

326 IAC 2-1.1-1 (Non-attainment NSR)

Clark County has been designated as nonattainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM 2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit 100 tpy of any regulated pollutant. The source has opted to remain a FESOP source and limit PM10 emissions to less than 100 tpy. Therefore, assuming that PM10 emissions represent PM2.5 emissions, the provisions of 326 IAC 2-1.1-1 (Nonattainment NSR) do not apply.

326 IAC 2-2 (Prevention of Significant Deterioration)

The source was constructed in 1967 with unrestricted potentials to emit of PM and PM₁₀ greater than 250 tons per year. However, because the source was constructed prior to August 7, 1977, it did not undergo PSD review. In addition, the potential to emit of PM₁₀ shall be limited to less than 100 tons per year by this permit. Since all PM from the source is equal to PM₁₀, PM is also limited to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) are not applicable.

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

The source was in existence prior to July 27, 1997. Therefore the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Clark County and the potential to emit of any regulated pollutant is less than one hundred (100) tons per year. This source is not required to have a Title V operating permit, pursuant to 326 IAC 2-7, it is not located in Lake, Porter, or LaPorte counties, and does not emit greater than or equal to five (5) tons per year of lead. Therefore, the provisions of 326 IAC 2-6 do not apply.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM₁₀ and VOC shall each be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

Since there is no distinction between PM and PM₁₀, pursuant to 326 IAC 2-8-4, the amount of PM/PM₁₀, shall be limited to less than one hundred (100) tons per year. In order to limit the PM/PM₁₀ emissions from the entire source to less than one hundred (100) tons per year, the following limits shall apply, unless otherwise stated in this permit:

- (a) The coatings applied by the spray paint room EU1 shall be limited such that total PM emissions shall not exceed 70.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The PM₁₀ emissions from the abrasive media blast room, known as EU2, shall not exceed 4.00 pounds per hour.
- (c) The PM₁₀ emissions from the mechanical blaster, known as EU3, shall not exceed 0.34 pounds per hour.
- (d) The dry filters shall be in operation at all times the surface coating process is in operation, the water wash control system shall be in operation at all times the sand blasting process is in operation, and the baghouse shall be in operation at all times the blast cleaning process is in operation, in order to comply with the PM₁₀ limits.

These emission limits will assure compliance with the one hundred (100) ton per year PM/PM₁₀ limit pursuant to 326 IAC 2-8-4.

The total volatile organic compound (VOC) delivered to the coating applicators at the one (1) spray paint room (EU1), plus the VOC used for cleanup, shall be less than 99 tons per consecutive twelve (12) month period. This will limit source-wide emissions of VOC to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

The worst case single HAP delivered to the coating applicators at the one (1) spray paint room (EU1), plus amount of that HAP used for cleanup shall be less than 10.0 tons per twelve (12) consecutive month period. This will limit source-wide emissions of a single HAP to less than 10 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

The combination of HAPs delivered to the coating applicators at the one (1) spray paint room (EU1), plus the total HAPs used for cleanup shall be less than 25.0 tons per twelve (12) consecutive month period. This will limit source-wide emissions of a combined HAP to less than 25 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

326 IAC 5-1 (Opacity Limitations)

This source is located in the Jeffersonville Township. Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) 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.

State Rule Applicability - Individual Facilities

326 IAC 6.5-1 (Particulate Matter Limitations Except Lake County)

This source is located in Clark County, which is listed in 326 IAC 6.5-1-1(a), but the source is not specifically listed in 326 IAC 6.5-2. Since the actual PM emissions from the entire source are greater than ten (10) tons per year, the requirements of 326 IAC 6.5-1-2 are applicable.

- (a) Pursuant to 326 IAC 6.5-1-2(a), the one (1) paint room (EU1) at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot). The dry filters shall be in operation at all times the one (1) paint room is in operation, in order to comply with this limit.
- (b) Pursuant to 326 IAC 6.5-1-2(a), the one (1) abrasive media blast room (EU2) equipped with a water wash control system at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot). The water wash control system shall be in operation at all times the sand blast room is in operation, in order to comply with this limit.
- (c) Pursuant to 326 IAC 6.5-1-2(a), the one (1) mechanical blast unit (EU3) equipped with a baghouse at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot). The baghouse shall be in operation at all times the mechanical blast unit is in operation, in order to comply with this limit.
- (d) Pursuant to 326 IAC 6.5-1-2(a), the one (1) insignificant structural steel and tank fabrication process at this source shall not allow or permit discharge to the atmosphere any gases which contain particulate matter in excess of 0.07 gram per dry standard cubic meter (0.03 grain per dry standard cubic foot).

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray paint room shall be limited to 3.5 pounds of VOC per gallon of coating less water, for air dried coatings.

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 information submitted by the source and calculations made, the spray paint room is in compliance with this requirement.

Testing Requirements

Testing is not required for VOC emissions, because the emission calculations were based on MSDS sheets. Testing is not required for the PM₁₀ facilities because the control devices for PM₁₀ all exceed 90%, while control efficiencies of only 70% are required to meet the FESOP limits.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a 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 Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements 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.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

- (a) The spray paint room (EU1) has applicable compliance monitoring conditions as specified below:
 - (1) 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 one (1) spray paint room (EU1) stack while the booth is in operation. If a condition exists which would 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.
 - (2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and/or 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.
- (b) The abrasive media blast room (EU2) has applicable compliance monitoring conditions as specified below:
 - (1) Daily inspections shall be performed to verify that the water level of the water wash control system for the abrasive media blast room, known as EU2, meet the manufacturer's recommended level.
 - (2) To monitor the performance of the water wash control system, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan.
 - (3) To monitor the performance of the baffles, weekly inspections of the baffle panels

shall be conducted to verify that the placement and configuration meet recommendations of the manufacturer.

- (4) Daily observations shall be made of the visible emission from the abrasive media blast room (EU2) stack exhaust while the emission unit is in operation. If abnormal emissions are 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 the section mentioned above shall be considered a deviation from this permit.
- (c) The mechanical blaster (EU3) has applicable compliance monitoring conditions as specified below:
- (1) Visible emission notations of the mechanical blaster (EU3) stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are 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 the section mentioned above shall be considered a deviation from this permit.
 - (2) The Permittee shall record the pressure drop across the baghouse used in conjunction with the mechanical blaster (EU3), at least once per day when the mechanical blaster is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit. The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.
 - (3) In the event that bag failure has been observed:
 - (A) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
 - (B) For a single compartment baghouse, controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this

permit (Section B - Emergency Provisions).

- (C) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the dry filters, baghouse and water wash system must operate properly to ensure compliance with 326 IAC 6.5-1 (Nonattainment Area Particulate Limitations), 326 IAC 5-1 (Opacity Limitations) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this steel tank manufacturing source shall be subject to the conditions of the attached proposed FESOP No.: F 019-23666-00075.

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

**Company Name: G.F. Munich Welding Co., LLC
Address City IN Zip: 211 Eastern Boulevard, Jeffersonville, IN 47130
FESOP#: F 019-23666-00075
Plt ID#: 019-00075
Reviewer: Jeff Scull
Date: May 25, 2007**

| Material | Density (lb/gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Vol (solids) | Gal of Mat (gal/unit) | Maximum (unit/hour) | Flash-off (fraction) | 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 per year | lb VOC /gal solids | Transfer Efficiency | |
|---------------------------|------------------|------------------------------------|----------------|-------------------|----------------|---------------------------|-----------------------|---------------------|----------------------|---|----------------------------------|-------------------------------|------------------------------|-----------------------------|-------------------------------------|--------------------|---------------------|--|
| Carboline 890 | | | | | | | | | | | | | | | | | | |
| Part A | 11.70 | 10.0% | 0.0% | 10.0% | 0.0% | 90.00% | 25.000 | 0.18 | 1.00 | 1.2 | 1.2 | 5.27 | 126.36 | 23.06 | 51.89 | 1.30 | 75% | |
| Part B | 13.40 | 17.0% | 0.0% | 17.0% | 0.0% | 83.00% | 25.000 | 0.18 | 1.00 | 2.3 | 2.3 | 10.25 | 246.02 | 44.90 | 54.80 | 2.74 | 75% | |
| Interlac 260 | | | | | | | | | | | | | | | | | | |
| Interlac 260 | 13.20 | 18.9% | 0.0% | 18.9% | 0.0% | 81.10% | 0.227 | 4.00 | 1.00 | 2.49 | 2.49 | 2.27 | 54.37 | 9.92 | 10.64 | 3.08 | 75% | |
| L-626 Solvent | 6.93 | 100.0% | 50.0% | 50.0% | 0.0% | 100.00% | 0.023 | 4.00 | 1.00 | 3.5 | 3.5 | 0.32 | 7.65 | 1.40 | 0.00 | 3.47 | 75% | |
| Tnemec | | | | | | | | | | | | | | | | | | |
| HB Epoxyline II | 15.58 | 17.1% | 0.0% | 17.1% | 0.0% | 82.90% | 25.000 | 0.18 | 1.00 | 2.66 | 2.66 | 11.97 | 287.39 | 52.45 | 63.66 | 3.21 | 75% | |
| HB Epoxyline II Converter | 11.48 | 16.6% | 0.0% | 16.6% | 0.0% | 83.40% | 25.000 | 0.18 | 1.00 | 1.9 | 1.9 | 8.57 | 205.69 | 37.54 | 47.18 | 2.28 | 75% | |
| | | | | | | | | | | | | TOTAL: | 38.6 | 927 | 169 | 228 | | |

| | |
|--------------------------|----------------|
| Control Efficiency | Controlled |
| | PM Particulate |
| | 93% tons/yr |
| Controlled Total: | 16.0 |

Controlled Emissions due to Surface Coating Operations and Controls

METHODOLOGY

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

HAP Emission Calculations

Company Name: G.F. Munich Welding Co., LLC
 Address City IN Zip: 211 Eastern Boulevard, Jeffersonville, IN 47130
 FESOP#: F 019-23666-00075
 Plt ID#: 019-00075
 Reviewer: Jeff Scull
 Date: May 25, 2007

| Material | Density (lb/gal) | Gal of Mat (gal/unit) | Maximum (unit/hour) | Weight % Xylene | Weight % Ethylbenzene | Weight % Glycol Ethers | Weight % Dimethylbenzene | Weight % MIBK | Xylene Emissions (tons/yr) | Ethylbenzene Emissions (tons/yr) | Glycol Ethers Emissions (tons/yr) | Dimethylbenzene Emissions (tons/yr) | MIBK Emissions (tons/yr) | Total HAPS (tons/yr) |
|---------------------------|------------------|-----------------------|---------------------|-----------------|-----------------------|------------------------|--------------------------|---------------|----------------------------|----------------------------------|-----------------------------------|-------------------------------------|--------------------------|----------------------|
| Carboline 890 | | | | | | | | | | | | | | |
| Part A | 11.70 | 25.000 | 0.18 | 10.00% | 5.00% | 0.00% | 0.00% | 0.00% | 23.06 | 11.53 | 0.00 | 0.00 | 0.00 | |
| Part B | 13.40 | 25.000 | 0.18 | 10.00% | 5.00% | 0.00% | 0.00% | 0.00% | 26.41 | 13.21 | 0.00 | 0.00 | 0.00 | |
| | | | | | | | | | | | | | | |
| Interlac 260 | | | | | | | | | | | | | | |
| Interlac 260 | 13.20 | 0.227 | 4.00 | 25.00% | 10.00% | 0.00% | 0.00% | 0.00% | 13.12 | 5.25 | 0.00 | 0.00 | 0.00 | |
| L-626 Solvent | 6.93 | 0.023 | 4.00 | 40.00% | 10.00% | 0.00% | 0.00% | 0.00% | 1.12 | 0.28 | 0.00 | 0.00 | 0.00 | |
| | | | | | | | | | | | | | | |
| Tnemec | | | | | | | | | | | | | | |
| HB Epoxyline II | 15.58 | 25.000 | 0.18 | 0.00% | 2.18% | 5.00% | 9.09% | 0.00% | 0.00 | 6.69 | 15.35 | 27.91 | 0.00 | |
| HB Epoxyline II Converter | 11.48 | 25.000 | 0.18 | 0.00% | 1.25% | 0.00% | 11.21% | 3.72% | 0.00 | 2.83 | 0.00 | 25.36 | 8.41 | |
| | | | | | | | | | | | | | | |

Total Potential HAPS Emissions

| | | | | | | | |
|----------------|-------------------|--------------|--------------|--------------|--------------|--------------|------------|
| TOTALS: | (tons/yr): | 63.71 | 39.79 | 15.35 | 53.27 | 8.41 | 181 |
| | (lb/hr): | 14.56 | 9.09 | 3.51 | 12.17 | 1.92 | |
| | (g/sec): | 1.83 | 1.15 | 0.442 | 1.534 | 0.242 | |

Note: The weight percent HAPs for some coatings is expressed as a range (i.e. 5 - 10%) on the MSDS sheets.

The maximum value of the range has been used in the PTE calculations. Accordingly, the Total HAPs PTE exceeds the Total VOC PTE on page 1.

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Emissions Calculations

1. PM Emissions From Abrasive Media Blasting (EU2)

PM emissions from abrasive media blasting were calculated from information supplied by the permittee on form CE-01 as follows:

$$\frac{15,960 \text{ ft}^3}{\text{min}} \times \frac{0.00095 \text{ gr}}{\text{ft}^3} \times \frac{60 \text{ min}}{\text{hr}} \times \frac{1 \text{ lb}}{7,000 \text{ gr}} \times \frac{8,760 \text{ hr}}{\text{yr}} \times \frac{\text{ton}}{2,000 \text{ lb}} = 0.569 \text{ tons / yr PM}$$

Where: Grain loading: 0.00095 gr/ft³
Air flow rate: 15,950 acfm

Assuming a wet collector efficiency of 99%, PM emissions before controls are

0.569 TPY / 0.01 = 56.9 TPY uncontrolled PM emission

2. PM Emissions From Mechanical Blasting (EU3)

PM emissions from mechanical blasting were calculated from information supplied by the permittee on form CE-01 as follows:

$$\frac{4,525 \text{ ft}^3}{\text{min}} \times \frac{0.00155 \text{ gr}}{\text{ft}^3} \times \frac{60 \text{ min}}{\text{hr}} \times \frac{1 \text{ lb}}{7,000 \text{ gr}} \times \frac{8,760 \text{ hr}}{\text{yr}} \times \frac{\text{ton}}{2,000 \text{ lb}} = 0.004 \text{ tons / yr PM}$$

Where: Grain loading: 0.00155 gr/ft³
Air flow rate: 4,525 acfm

Assuming a baghouse efficiency of 99.9%, PM emissions before controls are

0.004 TPY / 0.001 = 4.39 TPY uncontrolled PM emission