



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: June 2, 2008

RE: Square D Company / 103-24141-00025

FROM: Matthew Stuckey, 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



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## Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Square D Company  
252 N. Tippecanoe St.  
Peru, Indiana 46970**

(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.

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

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

Operation Permit No.: M103-24141-00025	
Issued by: Original Signed By:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 2, 2008  Expiration Date: June 2, 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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary an electrical circuit breaker panelboard manufacturing source.

Source Address:	252 N. Tippecanoe St., Peru, Indiana 46970
Mailing Address:	252 N. Tippecanoe Street, Peru, IN 46970
General Source Phone Number:	765-472-3381
SIC Code:	3613
County Location:	Miami
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source 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

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

- (a) One (1) electrocoat paint system, using a ten (10) stage phosphate pretreatment and an electro-deposition cathodic acrylic water-based paint, installed in 2001, consisting of:
- (1) One (1) E-coat paint system dip tank with solvent recovery through ultrafiltration at paint bath and post rinse, exhausted through Stack S3, capacity: 1,080 metal parts for panelboard products per hour.
  - (2) Two (2) natural gas-fired boilers, identified as boiler #1 - paint line and alternate boiler #2 - paint line, rated at 5 million British thermal units per hour, each, exhausted through Stacks S8 and S8A, respectively.
  - (3) One (1) dehydration natural gas-fired oven, identified as paint dehydration burner, rated at 3 million British thermal units per hour, exhausted through Stack S7.
  - (4) One (1) natural gas-fired cure oven, identified as paint cure oven burner, rated at 4.5 million British thermal units per hour, exhausted through Stack S7.
  - (5) One (1) storage tank, identified as E-coat tank, capacity: 19,700 gallons of E-Coat paint.
  - (6) One (1) storage tank, identified as bulk resin, capacity: 7,578 gallons of paint resin.
  - (7) Two (2) back-up storage tanks, identified as paint storage, capacity: 10,689 gallons of E-Coat paint, each.

- (8) One (1) storage tank, identified as E-coat waste, capacity: 2,500 gallons of paint waste.
  - (9) One (1) ten (10) stage cleaning and phosphating spray aqueous pretreatment operation, exhausting through Stacks S1 and S2.
  - (10) One (1) post rinse - 5 stage operation, exhausting through Stack S4.
  - (11) One (1) oven air seal & tunnel, exhausting through Stack S6.
  - (12) One (1) incinerator used as a paint burn-off oven, rated at 0.625 million British thermal units per hour, exhausting through Stack R, capacity: 40 pounds of paint per hour.
- (b) One (1) powder spray booth, identified as Q1, constructed in 1995, using electrostatic air atomization and high volume, low pressure (HVLP) spray equipment, equipped with dry filters, exhausting to Stack Q, capacity: 13.5 units per hour.
  - (c) One (1) natural gas-fired oven, identified as Powder Coat Oven, constructed in 1995 rated at 0.8 million British thermal units per hour.
  - (d) One (1) spray paint touch-up operation, installed in 2006.
  - (e) One (1) metalworking operation constructed prior to 1972, consisting of: MIG welding of panel boxes, capacity: 15 panel boxes per day, 8 feet of weld per box; five (5) laser cutting operations; and weld clean-up and buffing/polishing operation.
  - (f) One (1) natural gas-fired boiler, identified as Boiler #2, installed in 1949, exhausting to Stack B, rated at 7.592 million British thermal units per hour.
  - (g) Thirty (30) natural gas-fired heating units, installed in 2006, each rated at less than 10.0 million British thermal units per hour, rated at 11.7 million British thermal units per hour, total.

## SECTION B GENERAL CONDITIONS

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

---

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

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

---

- (a) This permit, M103-24141-00025, 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]

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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

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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

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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

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

### B.7 Duty to Provide Information

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- (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

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

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

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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- (a) All terms and conditions of permits established prior to M103-24141-00025 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

**B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]**

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

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

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
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 shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

**B.15 Source Modification Requirement**

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

**B.16 Inspection and Entry**

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

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

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

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

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

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

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

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

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

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
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 notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

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

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- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

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

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
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. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

#### **C.8 Performance Testing [326 IAC 3-6]**

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

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
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]**

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

## **Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]**

### **C.10 Compliance Monitoring [326 IAC 2-1.1-11]**

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

### **C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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

### **C.12 Instrument Specifications [326 IAC 2-1.1-11]**

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

## **Corrective Actions and Response Steps**

### **C.13 Response to Excursions or Exceedances**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or

- (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

**C.14 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (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 2-6.1-5(a)(2)]**

**C.15 Malfunctions Report [326 IAC 1-6-2]**

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

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

C.16 General Record Keeping Requirements [326 IAC 2-6.1-5]

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner 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.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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- (a) Reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) electrocoat paint system, using a ten (10) stage phosphate pretreatment and an electro-deposition cathodic acrylic water-based paint, installed in 2001, consisting of:
- (1) One (1) E-coat paint system dip tank with solvent recovery through ultrafiltration at paint bath and post rinse, exhausted through Stack S3, capacity: 1,080 metal parts for panelboard products per hour.
  - (2) Two (2) natural gas-fired boilers, identified as boiler #1 - paint line and alternate boiler #2 - paint line, rated at 5 million British thermal units per hour, each, exhausted through Stacks S8 and S8A, respectively.
  - (3) One (1) dehydration natural gas-fired oven, identified as paint dehydration burner, rated at 3 million British thermal units per hour, exhausted through Stack S7.
  - (4) One (1) natural gas-fired cure oven, identified as paint cure oven burner, rated at 4.5 million British thermal units per hour, exhausted through Stack S7.
  - (5) One (1) storage tank, identified as E-coat tank, capacity: 19,700 gallons of E-Coat paint.
  - (6) One (1) storage tank, identified as bulk resin, capacity: 7,578 gallons of paint resin.
  - (7) Two (2) back-up storage tanks, identified as paint storage, capacity: 10,689 gallons of E-Coat paint, each.
  - (8) One (1) storage tank, identified as E-coat waste, capacity: 2,500 gallons of paint waste.
  - (9) One (1) ten (10) stage cleaning and phosphating spray aqueous pretreatment operation, exhausting through Stacks S1 and S2.
  - (10) One (1) post rinse - 5 stage operation, exhausting through Stack S4.
  - (11) One (1) oven air seal & tunnel, exhausting through Stack S6.
  - (12) One (1) incinerator used as a paint burn-off oven, rated at 0.625 million British thermal units per hour, exhausting through Stack R, capacity: 40 pounds of paint per hour.
- (b) One (1) powder spray booth, identified as Q1, using electrostatic air atomization and high volume, low pressure (HVLP) spray equipment, equipped with dry filters, exhausting to Stack Q, capacity: 13.5 units per hour.
- (c) One (1) natural gas-fired oven, identified as Powder Coat Oven, rated at 0.8 million British thermal units per hour.
- (d) One (1) spray paint touch-up operation, installed in 2006.

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

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

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

---

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the powder spray booth (Q1) shall be limited to 3.5 pounds of VOC per gallon of coating less water, for air dried or extreme performance 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.

### D.1.2 Volatile Organic Compounds (VOC) Compliance Methods [326 IAC 8-1-2]

---

Pursuant to 326 IAC 8-1-2(a)(9)(A), the the volatile organic compound (VOC) emissions of the E-coat system shall be limited by the equivalent emission limit of 6.7 pounds of VOCs per gallon of coating solids as applied, for the dip coating or flow coating operation for air dried or extreme performance coatings.

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

---

Pursuant to 326 IAC 8-2-1, the volatile organic compound (VOC) emissions of the spray paint touch up operation, shall be limited to 15 pounds of VOC per day before add-on controls such that the requirements of of 326 IAC 8-2-9 (Miscellaneous Metal Coating) do not apply.

### D.1.4 Particulate Matter (PM) [326 IAC 6-3-2]

---

Particulate from the surface coating process identified as Spray Booth Q1, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

### D.1.5 Particulate Matter (PM) [326 IAC 6-2-4]

---

Pursuant to 326 IAC 6-2-4, the PM emissions from two (2) natural gas-fired boilers, identified as boiler #1 - paint line and alternate boiler #2 - paint line, each rated at 5.0 million British thermal units per hour, shall not exceed 0.517 pounds per million British thermal units. This limitation was computed using the following equation:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

$$Pt = 1.09 / Q^{0.26}$$

$$Pt = 1.09 / (17.59)^{0.26} = 0.517 \text{ lb/MMBtu}$$

### D.1.6 Burning Regulations for Incinerators (PM) [326 IAC 4-2]

---

Pursuant to 326 IAC 4-2-2, the incinerator used as a paint burn-off oven shall not emit particulate

matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air.

#### D.1.7 Preventive Maintenance Plan [326 IAC 1-6-3]

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A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for these emission units and any control devices.

### Compliance Determination Requirements [326 IAC 2-1.1-11]

#### D.1.8 Volatile Organic Compounds (VOC)

---

(a) Compliance with the VOC content limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) 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.

(b) Pursuant to 326 IAC 8-1-2(a)(9)(B), compliance with the equivalent emission limitations contained in Condition D.1.2 shall be determined by the following:

- (1) Calculate the VOC content of a dip coating or flow coating, expressed in units of weight of VOC per volume of coating solids, on a thirty (30) day rolling average basis using the following equation:

$$VOC_A = (\sum (W_{oi} \times D_{ci} \times Q_i) + \sum (W_{oJ} \times D_{dJ} \times Q_J)) / (\sum (V_{ni} \times Q_i))$$

Where:

- $VOC_A$  = The as-applied, VOC content in pound VOC per gallon (lb VOC/gal) of coating solids for a dip coating or flow coating, calculated on a thirty (30) day rolling average basis.
- $W_{oi}$  = Percent VOC by weight of each as supplied coating (i) added to the dip coating or flow coating process, expressed as a decimal fraction (that is 55% = 0.55).
- $D_{ci}$  = Density of each as supplied coating (i) added to the dip coating or flow coating process, in pounds per gallon.
- $Q_i$  = Quantity of each as supplied coating (i) added to the dip coating or flow coating process, in gallons.
- $V_{ni}$  = Percent solids by volume of each as supplied coating (i) added to the dip coating or flow coating process, expressed as a decimal fraction.
- $W_{oJ}$  = Percent VOC by weight of each thinner (J) added to the dip coating or flow coating process, expressed as a decimal fraction.
- $D_{dJ}$  = Density of each thinner (J) added to the dip coating or flow coating process, in pounds per gallon.
- $Q_J$  = Quantity of each thinner (J) added to the dip coating or flow coating process, in gallons.

#### D.1.9 Particulate Matter (PM)

---

In order to comply with Condition D.1.4, the dry filters for PM control shall be in operation at all times when the one (1) powder spray booth (Q1) is in operation.

## **Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

### **D.1.10 Monitoring Requirements**

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If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (a) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (b) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operation, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

### **D.1.11 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1 the Permittee shall maintain records of the amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents. Records shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.1.
- (b) To document compliance with Condition D.1.2 the Permittee shall comply with the following:
  - (1) Maintain the following records on a daily basis for each VOC-containing coating, solvent, or other material added to the tank:
    - (A) The following parameters for each coating, thinner, or other material as supplied:
      - (i) The coating, thinner, or other material identification number.
      - (ii) The volume used.
      - (iii) The mix ratio.
      - (iv) The density or specific gravity.
      - (v) The weight percent of total volatiles, water, solids, and exempt solvents.
      - (vi) The volume percent of solids.
    - (B) The VOC content of each coating and thinner as supplied.
    - (C) The VOC content of each as-applied coating.
  - (2) Maintain all records necessary to confirm compliance:
    - (A) On-site for the most recent three (3) year period.
    - (B) Make reasonably accessible for an additional two (2) years.

- (c) To document compliance with Condition D.1.3 the Permittee shall maintain records of the amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents. Records shall be taken daily and shall be complete and sufficient to establish compliance with the VOC pound per day emission limit established in Condition D.1.3.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (e) One (1) metalworking operation, consisting of: MIG welding of panel boxes, capacity: 15 panel boxes per day, 8 feet of weld per box; five (5) laser cutting operations; and weld clean-up and buffing/polishing operation.

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

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

#### D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Particulate from the MIG welding of panel boxes, five (5) laser cutting operations, and weld clean-up and buffing/polishing operations with a maximum process rate of 9,900 pounds per hour shall be limited by the following equation:

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

Given a maximum process rate of 9,900 pounds per hour, the source's PM emissions from the MIG welding of panel boxes, five (5) laser cutting operations, and weld clean-up and buffing/polishing operations shall not exceed 11.97 pounds per hour.

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (f) One (1) natural gas-fired boiler, identified as Boiler #2, installed in 1949, exhausting to Stack B, rated at 7.592 million British thermal units per hour.

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

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

#### D.3.1 Particulate Matter (PM) [326 IAC 6-2-3]

The boiler, identified as Boiler #2 constructed in 1949, with a total heat input capacity of 7.592 million British thermal units per hour, shall not exceed emissions of 0.8 pounds of PM per million British thermal units. This limitation is based on the following equation given in 326 IAC 6-2-3:

$$Pt = C \times a \times h / 76.5 \times Q^{0.75} \times N^{0.25}$$

therefore:

$$Pt = 50 \times 0.67 \times 31 / 76.5 \times (7.592)^{0.75} \times 1^{0.25} = 2.97 \text{ lb/MMBtu}$$

Pursuant to 326 IAC 6-2-3(d) Boiler #2 which was existing and in operation on or before June 8, 1972 shall not exceed 0.8 pounds per million British thermal units.

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	Square D Company
<b>Address:</b>	252 N. Tippecanoe St.
<b>City:</b>	Peru, Indiana 46970
<b>Phone #:</b>	765-472-3381
<b>MSOP #:</b>	M103-24141-00025

I hereby certify that Square D Company is :

still in operation.

no longer in operation.

I hereby certify that Square D Company is :

in compliance with the requirements of MSOP M103-24141-00025.

not in compliance with the requirements of MSOP M103-24141-00025.

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

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

<b>Noncompliance:</b>

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_    \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_

INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Square D. Company</b>
<b>Source Location:</b>	<b>252 N. Tippecanoe Street, Peru, Indiana 46970</b>
<b>County:</b>	<b>Miami</b>
<b>SIC Code:</b>	<b>3613</b>
<b>Operation Permit No.:</b>	<b>M103-24141-00025</b>
<b>Permit Reviewer:</b>	<b>Jeremy Palin</b>

On April 14, 2008, the Office of Air Quality (OAQ) had a notice published in the Peru Daily Tribune, Peru, Indiana, stating that Square D Company had applied for a Minor Source Operating Permit Renewal. The notice also stated that the OAQ proposed to issue a Minor Source Operating Permit Renewal 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.

**Comments and Responses**

No comments were received during the public notice period.

**Additional Changes**

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

- (a) IDEM has decided to change the language of the VOC limitation of Condition D.1.3, to better limit the PTE of the source;
- (b) IDEM has decided to delete Conditions D.1.4 and D.1.5, due to a change in our permit language;
- (c) Condition D.3.1 has been changed to correct the removal of important language from the condition.

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

Pursuant to 326 IAC 8-2-1, the volatile organic compound (VOC) emissions of the spray paint touch up operation, ~~will~~ **shall** be limited to 15 pounds of VOC per day before add-on controls. ~~This limit is being used at the request of the source so that they may avoid the VOC per gallon of coating limit of~~ **such that the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) do not apply.**

...  
~~D.1.4 Volatile Organic Compounds (VOC) [326 IAC 2-7]~~

~~Any change or modification that would increase the potential to emit of VOC for the source to 100 tons per year or more shall require prior approval from the Office of Air Quality (OAQ), as~~

~~\_\_\_\_\_ required by 326 IAC 2-1.1, before such change can occur.~~

...

~~D.1.5 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1] [326 IAC 2-7]~~

~~\_\_\_\_\_ Any change or modification that would increase the potential to emit of a single HAP to 10 tons per year or more, or the combination of HAPs to 25 tons per year or more, shall require prior approval from the Office of Air Quality (OAQ), as required by 326 IAC 2-1.1, before such change can occur.~~

...

D.3.1 Particulate Matter (PM) [326 IAC 6-2-3]

The boiler, identified as Boiler #2 constructed in 1949, with a total heat input capacity of 7.592 million British thermal units per hour, **shall not exceed emissions of 0.8 pounds of PM per million British thermal units**. This limitation is based on the following equation given in 326 IAC 6-2-3:

$$Pt = C \times a \times h / 76.5 \times Q^{0.75} \times N^{0.25}$$

therefore:

$$Pt = 50 \times 0.67 \times 31 / 76.5 \times (7.592)^{0.75} \times 1^{0.25} = 2.97 \text{ lb/MMBtu}$$

Pursuant to 326 IAC 6-2-3(d) Boiler #2 which was existing and in operation on or before June 8, 1972 shall not exceed 0.8 pounds per million British thermal units.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed Minor Source Operating Permit Renewal can be directed to Jeremy Palin at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5400 or toll free at 1-800-451-6027 extension 4-5400.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Square D Company</b>
<b>Source Location:</b>	<b>252 N. Tippecanoe Street, Peru, Indiana 46970</b>
<b>County:</b>	<b>Miami</b>
<b>SIC Code:</b>	<b>3613</b>
<b>Permit Renewal No.:</b>	<b>M103-24141-00025</b>
<b>Permit Reviewer:</b>	<b>Jeremy Palin</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Square D Company relating to the operation of an electrical circuit breaker panelboard manufacturing source.

**History**

On January 2, 2007, Square D Company submitted applications to the OAQ requesting to renew its operating permit. Square D Company was issued a Minor Source Operating Permit (MSOP 103-13816-00025) on April 1, 2002.

**Permitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) electrocoat paint system, using a ten (10) stage phosphate pretreatment and an electro-deposition cathodic acrylic water-based paint, installed in 2001, consisting of:
  - (1) One (1) E-coat paint system dip tank with solvent recovery through ultrafiltration at paint bath and post rinse, exhausted through Stack S3, capacity: 1,080 metal parts for panelboard products per hour.
  - (2) Two (2) natural gas-fired boilers, identified as boiler #1 - paint line and alternate boiler #2 - paint line, rated at 5 million British thermal units per hour, each, exhausted through Stacks S8 and S8A, respectively.
  - (3) One (1) dehydration natural gas-fired oven, identified as paint dehydration burner, rated at 3 million British thermal units per hour, exhausted through Stack S7.
  - (4) One (1) natural gas-fired cure oven, identified as paint cure oven burner, rated at 4.5 million British thermal units per hour, exhausted through Stack S7.
  - (5) One (1) storage tank, identified as E-coat tank, capacity: 19,700 gallons of E-Coat paint.
  - (6) One (1) storage tank, identified as bulk resin, capacity: 7,578 gallons of paint resin.
  - (7) Two (2) back-up storage tanks, identified as paint storage, capacity: 10,689 gallons of E-Coat paint, each.

- (8) One (1) storage tank, identified as E-coat waste, capacity: 2,500 gallons of paint waste.
  - (9) One (1) ten (10) stage cleaning and phosphating spray aqueous pretreatment operation, exhausting through Stacks S1 and S2.
  - (10) One (1) post rinse - 5 stage operation, exhausting through Stack S4.
  - (11) One (1) oven air seal & tunnel, exhausting through Stack S6.
  - (12) One (1) incinerator used as a paint burn-off oven, rated at 0.625 million British thermal units per hour, exhausting through Stack R, capacity: 40 pounds of paint per hour.
- (b) One (1) powder spray booth, identified as Q1, constructed in 1995, using electrostatic air atomization and high volume, low pressure (HVLP) spray equipment, equipped with dry filters, exhausting to Stack Q, capacity: 13.5 units per hour.
  - (c) One (1) natural gas-fired oven, identified as Powder Coat Oven, constructed in 1995 rated at 0.8 million British thermal units per hour.
  - (d) One (1) spray paint touch-up operation.
  - (e) One (1) metalworking operation constructed prior to 1972, consisting of: MIG welding of panel boxes, capacity: 15 panel boxes per day, 8 feet of weld per box; five (5) laser cutting operations; and weld clean-up and buffing/polishing operation.
  - (f) One (1) natural gas-fired boiler, identified as Boiler #2, installed in 1949, exhausting to Stack B, rated at 7.592 million British thermal units per hour.
  - (g) Thirty (30) natural gas-fired heating units, installed in 2006, each rated at less than 10.0 million British thermal units per hour, rated at 11.7 million British thermal units per hour, total.

### **Emission Units and Pollution Control Equipment Removed From the Source**

The following emission units have been removed from the source since the issuance of MSOP 103-13816-00025 on April 1, 2002:

- (a) One (1) natural gas-fired boiler, identified as Boiler #1, installed in 1949, exhausting to Stack A, rated at 7.488 million British thermal units per hour.
- (b) One (1) natural gas-fired boiler, identified as Boiler #3, installed in 1949, exhausting to Stack C, rated at 13 million British thermal units per hour.

All corresponding applicable requirements of these units indicated in the MSOP have been deleted.

### **Existing Approvals**

Since the issuance of the MSOP 103-13816-00025 on April 1, 2002, the source has constructed or has been operating under the following approval as well:

- (a) MSOP NOC 103-15821-00025, issued on April 15, 2002.

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 registrations and permits are superseded by this permit.

**Enforcement Issues**

There are no enforcement actions pending.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S1	Washer Entrance	31	1.25	2143	Ambient
S2	Washer Exit	31	2	4776	Ambient
S3	E-Coat Paint	31	1.5	3861	Ambient
S4	Post Rinse Exit	31	2	6779	Ambient
S5	Oven Purge	31	2.42	11560	450
S6	Oven Air Seal	31	1.33	2497	450
S7	Paint Burn Oven Curer	31	2	7589	450
S8	Boiler #1 - Paintline	31	1.5	2556	300
S8A	Boiler #2 - Paintline	31	1.5	2556	300
Stack B	Boiler #2	31	1.5	9300	400
Stack R	Oven	31	1.25	Draft	1500
Stack Q	Powder Booth Q1	20	3.4	9500	Ambient

**Emission Calculations**

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

**County Attainment Status**

The source is located in Miami County

Pollutant	Status
PM <sub>10</sub>	Attainment
PM <sub>2.5</sub>	Attainment
SO <sub>2</sub>	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, St. Joseph as attainment for the 8-hour ozone standard.

- (a) Miami County has been classified as unclassifiable or attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub>

emissions as a surrogate for PM<sub>2.5</sub> emissions. See the State Rule Applicability – Entire Source section.

- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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 NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Miami County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO<sub>x</sub> 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) Miami County has been classified as attainment or unclassifiable in Indiana for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and Lead. 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	8.79
PM-10	9.86
SO <sub>2</sub>	0.10
VOC	70.76
CO	14.10
NO <sub>x</sub>	16.74
HAPs	0.35

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is less than 100 tons per year but VOC is greater than 25 tons per year. The source is still not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP renewal
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

### 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

No previous emission data has been received from the source.

### Potential to Emit After Issuance

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 MSOP 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 (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
E-coat Paint System Including Combustion	0.151	0.603	Neg	67.58	6.67	7.94	Neg.
Polyester Powder Paint (Q1)	6.50	6.50	---	---	---	---	---
Touch-up Paint Operation	0.14	0.14	---	2.71	---	---	0.35
Powder Coat Oven	Neg.	Neg.	Neg.	Neg.	0.294	.350	Neg.
Boiler #2	Neg.	0.253	Neg.	0.183	2.79	3.33	Neg.
Metalworking Operation	2.00	2.00	---	---	---	---	---
Thirty (30) Heating Units	Neg.	0.389	Neg.	0.282	4.30	5.12	Neg.
Total Emissions	8.79	9.86	0.10	70.76	14.1	16.74	0.35

"---" Denotes that there are no emissions of the specified pollutant

"Neg." Denotes that there are negligible emissions of the specified pollutant (less than .01 tons)

### Federal Rule Applicability

- (a) The two (2) paint line natural gas-fired boilers, identified as boiler #1 - paint line, and alternate boiler #2 - paint line, each rated at 5 million British thermal units per hour, and the two (2) natural gas-fired boilers, identified as boiler #1 and boiler #2, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because each boiler is rated at less than ten (10) million British thermal units per hour.
- (b) The one (1) storage tank, identified as E-coat tank, with a capacity of 19,700 gallons of E-Coat paint, and the two (2) back-up storage tanks, identified as paint storage, each with a capacity of 10,689 gallons of E-Coat paint, were previously subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110, Subpart Kb), but the capacity for Subpart Kb applicability is now seventy-five (75) cubic meters. Since each storage tanks capacity is less than seventy-five (75) cubic meters (19,813 gallons) the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110, Subpart Kb) is no longer applicable.
- (c) The one (1) storage tank, identified as bulk resin, with a capacity of 7,578 gallons of paint resin, and the one (1) storage tank, identified as E-coat waste, with a capacity of 2,500 gallons of paint waste, are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110, Subpart Kb), since their capacities are each less than seventy-five (75) cubic meters.
- (d) The one (1) incinerator used as a paint burn-off oven is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart EEE, because the paint that is burned off by the oven is not considered hazardous waste. The organic paint is volatilized by the process but no hazardous wastes are burned.

### State Rule Applicability - Entire Source

#### 326 IAC 2-6 (Emission Reporting)

This source is located in Miami County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

#### 326 IAC 5-1 (Opacity Limitations)

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

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

### State Rule Applicability – Individual Facilities

#### 326 IAC 4-2 (Incinerators)

The one (1) incinerator used as a paint burn-off oven, rated at 0.625 million British thermal units per hour, is subject to the requirements of 326 IAC 4-2-2. Pursuant to 326 IAC 4-2-2(8)(B), the allowable PM emission rate from incinerators with a burning capacity of less than 200 pounds per hour is 0.5 pounds of PM per one thousand (1,000) pounds of dry exhaust at standard conditions corrected to fifty percent (50%) excess air.

#### 326 IAC 6-2-3 (Particulate Emissions Limitations for Facilities Constructed prior to September 21, 1983)

The boiler, identified as Boiler #2 constructed in 1949, with a total heat input capacity of 7.592 million British thermal units per hour, must comply with the PM emission limitation of 326 IAC 6-2-3. This limitation is based on the following equation given in 326 IAC 6-2-3:

$$Pt = C \times a \times h / 76.5 \times Q^{0.75} \times N^{0.25}$$

where:

- Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input
- Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.
- C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.
- N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 MMBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 MMBtu/hr heat input.

h = Stack height in feet.

therefore:

$$Pt = 50 \times 0.67 \times 31 / 76.5 \times (7.592)^{0.75} \times 1^{0.25} = 2.97 \text{ lb/MMBtu}$$

However, pursuant to 326 IAC 6-2-3(d), Pt for all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972 shall not exceed 0.8 pounds per million British thermal units. Therefore, the PM emissions from Boiler #2 will be limited at 0.8 lb/MMBtu.

Based on Appendix A, the total potential to emit of PM from Boiler #2 is 0.1 tons per year.

$$0.1 \text{ tons/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.023 \text{ lbs/hr}$$
$$0.023 \text{ lbs/hr} / 7.592 \text{ MMBtu/hr} = 0.003 \text{ lbs PM per MMBtu}$$

Therefore Boiler #2 can comply with this rule, 326 IAC 6-3-2.

#### 326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983)

The two (2) natural gas-fired boilers, identified as boiler #1 - paint line and alternate boiler #2 - paint line, installed in 2001, with a total rating of 10.0 million British thermal units per hour, must comply with the requirements of 326 IAC 6-2-4. The emission limitations are based on the following equation is given in 326 IAC 6-2-4:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

$$Pt = 1.09 / Q^{0.26}$$

$$Pt = 1.09 / (17.59)^{0.26} = 0.517 \text{ lb/MMBtu}$$

The potential PM emission rate is 0.002 lb PM per MMBtu.

Therefore, the two (2) natural gas-fired boilers, identified as boiler #1 - paint line and alternate boiler #2 - paint line, can comply with 326 IAC 6-2-4.

This PM limit revises the existing limit based on the new total heat input of the boilers due to the removal of Boiler #1 and Boiler #3.

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

Pursuant to 326 IAC 6-3-2(d), Particulate from the surface coating process identified as Spray Booth Q1, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

Particulate from the MIG welding of panel boxes, five (5) laser cutting operations, and weld clean-up and buffing/polishing operations with a maximum process rate of 9,900 pounds per hour shall be limited by the following equation:

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

Given a maximum process rate of 9,900 pounds per hour, the source's PM emissions from the MIG welding of panel boxes, five (5) laser cutting operations, and weld clean-up and buffing/polishing operations shall not exceed 11.97 pounds per hour.

### 326 IAC 8-2 (Surface Coating Emission Limitations)

Pursuant to 326 IAC 8-2-1, the volatile organic compound (VOC) emissions of the spray paint touch up operation, will be limited to 15 pounds of VOC per day before add-on controls. This limit is being used at the request of the source so that they may avoid the VOC per gallon of coating limit of 326 IAC 8-2-9 (Miscellaneous Metal Coating).

Based on the MSDS submitted by the source and calculations made, the spray booth can comply with this requirement.

### 326 IAC 8-1-2 (VOC Compliance Methods)

Pursuant to 326 IAC 8-1-2, the volatile organic compound (VOC) emissions of the E-coat system shall be limited by the equivalent emission limit of 6.7 pounds of VOCs per gallon of coating solids as applied, for the dip coating or flow coating operation for air dried or extreme performance coatings subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations).

Compliance with this equivalent emission limit shall be determined by the following:

- (a) Calculate the VOC content of a dip coating or flow coating, expressed in units of weight of VOC per volume of coating solids, on a thirty (30) day rolling average basis using the following equation:

$$VOC_A = (\sum (W_{oi} \times D_{ci} \times Q_i) + \sum (W_{oj} \times D_{dj} \times Q_j)) / (\sum (V_{ni} \times Q_i))$$

Where:

- $VOC_A$  = The as-applied, VOC content in pound VOC per gallon (lb VOC/gal) of coating solids for a dip coating or flow coating, calculated on a thirty (30) day rolling average basis.
- $W_{oi}$  = Percent VOC by weight of each as supplied coating (i) added to the dip coating or flow coating process, expressed as a decimal fraction (that is 55% = 0.55).
- $D_{ci}$  = Density of each as supplied coating (i) added to the dip coating or flow coating process, in pounds per gallon.

- $Q_i$  = Quantity of each as supplied coating (i) added to the dip coating or flow coating process, in gallons.
- $V_{ni}$  = Percent solids by volume of each as supplied coating (i) added to the dip coating or flow coating process, expressed as a decimal fraction.
- $W_{oJ}$  = Percent VOC by weight of each thinner (J) added to the dip coating or flow coating process, expressed as a decimal fraction.
- $D_{dJ}$  = Density of each thinner (J) added to the dip coating or flow coating process, in pounds per gallon.
- $Q_J$  = Quantity of each thinner (J) added to the dip coating or flow coating process, in gallons.
- (b) Maintain the following records on a daily basis for each VOC-containing coating, solvent, or other material added to the tank:
- (1) The following parameters for each coating, thinner, or other material as supplied:
    - (A) The coating, thinner, or other material identification number.
    - (B) The volume used.
    - (C) The mix ratio.
    - (D) The density or specific gravity.
    - (E) The weight percent of total volatiles, water, solids, and exempt solvents.
    - (F) The volume percent of solids.
  - (2) The VOC content of each coating and thinner as supplied.
  - (3) The VOC content of each as-applied coating.
- (c) Maintain all records necessary to confirm compliance:
- (1) On-site for the most recent three (3) year period.
  - (2) Make reasonably accessible for an additional two (2) years.

Based on the MSDS submitted by the source and calculations made, the E-coat system can comply with this equivalent emission limit.

### 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 the coating delivered to the applicator at the E-coat system and the spray booth Q1 shall be limited to 3.5 pounds of VOCs per gallon of coating less water delivered to a coating applicator for air dried or extreme performance 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 MSDS submitted by the source and calculations made, the spray booth Q1 can comply with this requirement.

The E-coat system shall be limited by an equivalent emission limit and based on the MSDS submitted by the source and calculations made, the E-coat system can comply with this requirement.

## Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. 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.

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

If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (a) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (b) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operation, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

These monitoring conditions are necessary because the dry filters for the spray booth Q1 must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-6.1 (MSOP).

## Recommendation

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

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

An application for the purposes of this review was received on January 2, 2007.

## Conclusion

The operation of this electrical circuit breaker panelboard manufacturing source be subject to the conditions of the attached MSOP Renewal No. 103-24141-00025.

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

**Company Name: Square D Company**  
**Address City IN Zip: 252 N. Tippecanoe Street, Peru, Indiana 46970**  
**Permit Number: 103-24141-00025**  
**Plt ID: 103-00025**  
**Reviewer: Jeremy Palin**  
**Date: 9/19/2007**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

38.2

334.6

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.3	1.3	0.1	16.7	0.9	14.1

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

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**HAPs Emissions**

**Company Name: Square D Company**  
**Address City IN Zip: 252 N. Tippecanoe Street, Peru, Indiana 46970**  
**Permit Number: 103-24141-00025**  
**Pit ID: 103-00025**  
**Reviewer: Jeremy Palin**  
**Date: 9/19/2007**

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.514E-04	2.008E-04	1.255E-02	3.012E-01	5.689E-04

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	8.366E-05	1.840E-04	2.342E-04	6.358E-05	3.514E-04

Methodology is the same as page 1.

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

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

**Company Name: Square D Company  
Address City IN Zip: 252 N. Tippecanoe Street, Peru, Indiana 46970  
Permit Number: 103-24141-00025  
Pit ID: 103-00025  
Reviewer: Jeremy Palin  
Date: 9/19/2007**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
<b>E-Coat Paint System</b>																
Cathodic E-Coat Paint Powercron CR 925- CP 973	8.5	93.42%	89.2%	4.2%	90.3%	5.46%	0.04350	1080.000	3.67	0.33	15.33	367.91	67.14	0.00	6.54	100%

<b>State Potential Emissions</b>	<b>Add worst case coating to all solvents</b>	<b>Before Recycling</b>	<b>15.33</b>	<b>367.91</b>	<b>67.14</b>	<b>0.00</b>
	<b>Applicant Estimate After Solvent Recycling, Evaporation and Purges</b>		<b>3.54</b>	<b>84.96</b>	<b>15.51</b>	<b>0.00</b>

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
<b>10 Stage Cleaning and Phosphating Operation</b>																
ChemKleen 611LM	10.8	66.83%	66.8%	0.0%	NA	NA	1.01850	1.000	0.00	0.00	0.000	0.000	0.000	0.00	NA	100%

<b>State Potential Emissions</b>	<b>Add worst case coating to all solvents</b>	<b>Uncontrolled PTE</b>	<b>0.000</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
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**METHODOLOGY**

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

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

**Company Name: Square D Company  
Address City IN Zip: 252 N. Tippecanoe Street, Peru, Indiana 46970  
Permit Number: 103-24141-00025  
Pit ID: 103-00025  
Reviewer: Jeremy Palin  
Date: 9/19/2007**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
<b>Powder Spray Booth Q1</b>																
Polyester Powder Paint	12.6	0.06%	0.1%	0.0%	0.1%	100.00%	0.03500	13.500	0.00	0.00	0.00	0.00	0.00	6.50	0.00	75%
<b>Touch Up Operation</b>																
Spray Paint	6.48	91.40%	48.9%	42.5%	48.1%	4.20%	0.25	0.9	5.31	2.75	0.62	14.87	2.71	0.14	65.57	75%

<b>State Potential Emissions</b>	<b>Add worst case coating to all solvents</b>	<b>Uncontrolled PTE</b>	<b>0.62</b>	<b>14.87</b>	<b>2.71</b>	<b>6.51</b>
		<b>Controlled PTE</b>	<b>0.62</b>	<b>14.87</b>	<b>2.71</b>	<b>0.15</b>

**Powder Paint PM Control Efficiency = 99.80%**

**METHODOLOGY**

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

**Appendix A: Emission Calculations  
HAP Emission Calculations**

**Company Name: Square D Company**  
**Address City IN Zip: 252 N. Tippecanoe Street, Peru, Indiana 46970**  
**Permit Number: 103-24141-00025**  
**Plt ID: 103-00025**  
**Permit Reviewer: Jeremy Palin**  
**Date: July 19, 2007**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethylbenzene	Weight % Toluene	Xylene Emissions (ton/yr)	Benzene Emissions (tons/yr)	Toluene Emissions (ton/yr)
<b>Touch Up Operation</b>									
Spray Paint PK49SP	6.48	0.25000	0.900	2.0000%	0.4000%	3.000%	0.1300	0.0300	0.1900
<b>Worst Case Totals (tons/yr):</b>							<b>0.1300</b>	<b>0.0300</b>	<b>0.1900</b>

**METHODOLOGY**

**Total Worst Case HAPs: 0.3500 tons/yr**

Total State Potential Emissions

**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 lb