



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

TO: Interested Parties / Applicant

DATE: June 2, 2008

RE: Vestil Manufacturing Corporation / 151-25501-00035

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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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Vestil Manufacturing Corporation
2999 North Wayne Street
Angola, Indiana 46703**

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

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

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

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

Operation Permit No.: F151-25501-00035	
Issued by/Original Signed By:	Issuance Date: June 2, 2008
Iryn Calilung, Section Chief Permits Branch Office of Air Quality	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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary material handling and loading equipment manufacturing operation.

Source Address:	2999 North Wayne Street, Angola, Indiana 46703
Mailing Address:	P.O. Box 507, Angola, IN 46703
General Source Phone Number:	260-665-7586
SIC Code:	3499
County Location:	Steuben
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) spray paint booth, identified as B1, with a maximum capacity of 10 metal curbs per hour and a maximum paint usage of 0.2 gallons per curb, equipped with High Volume Low Pressure (HVLP) spray guns, using dry filters for overspray control, constructed in 1997, and exhausting to stack V1.
- (b) Three (3) spray paint booths, identified as B2, B3, and B4, each with a maximum capacity of 2 steel yard ramps per hour and a maximum paint usage of 4.0 gallons per ramp, equipped with High Volume Low Pressure (HVLP) spray guns, using dry filters for overspray control, constructed in 1995, and exhausting to stacks V2, V3, and V4, respectively.
- (c) Two (2) glue application stations, with a combined maximum capacity of 0.359 units per hour and a combined maximum glue usage of 0.2 gallons per unit, each utilizing a spray gun application, constructed in 1997, and exhausting into the building.
- (d) One (1) radial cross-cut woodsaw, identified as FS1, with a maximum throughput rate of 60 pounds of wood per hour, controlled by one (1) baghouse, constructed in 1995, and exhausting into the building.
- (e) One (1) radial arm 14" woodsaw, identified as FS2, with a maximum throughput rate of 60 pounds of wood per hour, controlled by one (1) cyclone and baghouse system, constructed in 1995, and exhausting into the building.
- (f) One (1) routing woodsaw, identified as FS3, with a maximum throughput rate of 60 pounds of wood per hour, controlled by one (1) cyclone and baghouse system, constructed in 1995, and exhausting into the building.

- (g) Fifty-one (51) steel MIG welding stations, each with a maximum wire consumption of 3.5 pounds per hour, utilizing a carbon steel E70S-6 electrode, 36 were constructed in 1995 and 15 in 1998, and exhausting into the building.
- (h) Six (6) aluminum MIG welding stations, each with a maximum wire consumption of 2.0 pounds per hour, utilizing an aluminum ER5356 electrode, constructed in 1995, and exhausting into the building.
- (i) Forty-one (41) oxyacetylene flame-cutting operations, each with a maximum cutting rate of 11.7 inches per minute for 0.75 inches thick steel, constructed in 1997, and exhausting into the building.

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

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following indirect heating units:
 - (1) Nine (9) natural gas-fired furnaces (identified as T2 through T8, and T14 through T16), each with a maximum heat input rate of 0.4 MMBtu/hr, constructed in 1995, and exhausting through stacks S2 through S8, and S14 through S16, respectively.
 - (2) Five (5) natural gas-fired furnaces (identified as C9 through C13), each with a maximum heat input rate of 0.154 MMBtu/hr, constructed in 1995, and exhausting through stacks S9 through S13, respectively.
 - (3) One (1) natural gas-fired heater, identified as W1, with a maximum heat input rate of 0.034 MMBtu/hr, constructed in 1995, and exhausting through stack WH1.
 - (4) One (1) natural gas-fired heater, identified as W2, with a maximum heat input rate of 0.44 MMBtu/hr, constructed in 1995, and exhausting through stack WH2.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour, including four (4) propane-fired fork lift trucks, identified as FT1 through FT4, with a total capacity of 56,000 Btu/hr.
- (c) Cleaners and solvents having a vapor pressure equal to or less than 2 kPa (15mm Hg or 0.3 psi) measured at 38 degrees C (100°F) or having a vapor pressure equal to or less than 0.7 kPa (5mm Hg or 0.1 psi) measured at 20°C (68°F). The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Other emission units, not regulated by a NESHAP, with PM10 and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs, including one (1) metal working shop, consisting of miscellaneous drills and cutting equipment, and exhausting inside the building.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F151-25501-00035, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain

certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 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, Indiana 46204-2251

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

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

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

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

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

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

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

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

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

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

- (a) All terms and conditions of permits established prior to F151-25501-00035 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

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

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

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

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

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

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

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

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

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

and

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

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

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

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

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

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
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 Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

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

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

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

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

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

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; 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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

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

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-8-4(10)]

- (a) One (1) spray paint booth, identified as B1, with a maximum capacity of 10 metal curbs per hour and a maximum paint usage of 0.2 gallons per curb, equipped with High Volume Low Pressure (HVLP) spray guns, using dry filters for overspray control, constructed in 1997, and exhausting to stack V1.
- (b) Three (3) spray paint booths, identified as B2, B3, and B4, each with a maximum capacity of 2 steel yard ramps per hour and a maximum paint usage of 4.0 gallons per ramp, equipped with High Volume Low Pressure (HVLP) spray guns, using dry filters for overspray control, constructed in 1995, and exhausting to stacks V2, V3, and V4, respectively.
- (c) Two (2) glue application stations, with a combined maximum capacity of 0.359 units per hour and a combined maximum glue usage of 0.2 gallons per unit, each utilizing a spray gun application, constructed in 1997, and exhausting into the building.

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

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

D.1.1 VOC and Hazardous Air Pollutants (HAPs) Limits [326 IAC 2-8-4]

- (a) The amount of VOC delivered to all the spray painting booths, the glue application stations, and their associated clean-up activities shall not exceed a total of 98.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The amount of any single HAP delivered to all the spray painting booths and the glue application stations plus the amount of any single HAP used for clean-up shall not exceed 9.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The amount of any combination of HAPs delivered to all the spray painting booths and the glue application stations plus the amount of any combination of HAPs used for clean-up shall not exceed 23.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Combined with the emissions from the woodworking, welding and flame cutting operations, and the insignificant activities, the VOC emissions from the entire source are limited to less than 100 tons per year each, and the HAP emissions are limited to less than 10 tons per year for any single HAP, and less than 25 tons per year for any combination of HAPs. Therefore, the requirements of 326 IAC 2-7 are not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five tenths (3.5) that applies extreme performance coatings pounds of VOC per gallon of coating excluding water as delivered to the applicator.
- (b) Pursuant to 326 IAC 8-2-9(f) (Miscellaneous Metal Coating Operations) all solvents sprayed from the application equipment of paint booths B1, B2, B3 and B4 during clean up or color changes shall be directed into containers. Such containers shall be closed as

soon as such solvent spraying is complete. In addition all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes), particulate from spray booths (B1, B2, B3, and B4) shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.5 VOC and HAP Emissions

Compliance with Conditions D.1.1(a), (b), (c) shall be demonstrated within 30 days of the end of each month based on the total VOC and HAP usage for the most recent twelve (12) month period.

D.1.6 VOC and HAP Emissions

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

D.1.7 Particulate [326 IAC 6-3-2 (d)]

Pursuant to 326 IAC 6-3-2(d) and in order to comply with D.1.3, the dry filters for particulate control shall be in operation in accordance with manufacturer's specifications and control particulate from the four (4) spray booths (B1, B2, B3 and B4) shall be controlled by a dry particulate control system at all times when these spray booths are in operation.

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

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray painting booth stacks (V1, V2, V3, and V4) while one or more of the booths are in operation. The Response to Excursions or Exceedances Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emission is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1(a), D.1.1(b), D.1.1(c) and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits established in Conditions D.1.1(a), D.1.1(b), and D.1.1(c), and the VOC content limit contained in Condition D.1.2.
 - (1) The VOC and HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on daily basis. 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.
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month ;
 - (5) The total HAP and VOC usage for each month; and
 - (6) The weight of VOC and HAP usage for each compliance period.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-8-4(10)]

- (d) One (1) radial cross-cut woodsaw, identified as FS1, with a maximum throughput rate of 60 pounds of wood per hour, controlled by one (1) baghouse, constructed in 1995, and exhausting into the building.
- (e) One (1) radial arm 14" woodsaw, identified as FS2, with a maximum throughput rate of 60 pounds of wood per hour, controlled by one (1) cyclone and baghouse system, constructed in 1995, and exhausting into the building.
- (f) One (1) routing woodsaw, identified as FS3, with a maximum throughput rate of 60 pounds of wood per hour, controlled by one (1) cyclone and baghouse system, constructed in 1995, and exhausting into the building.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions from each of the woodworking operations shall not exceed 0.39 pounds per hour when operating at a process weight rate of 60 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.2.3 Particulate Emissions

In order to comply with Condition D.2.1, the baghouses and cyclones used for particulate control shall be in operation at all times when the woodsaws are in operation.

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

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the stack exhausts from baghouses and cyclones shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.5 Broken or Failed Bag Detection

- (a) For single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies requirements of the emergency provisions of this permit (Section B- Emergency Provisions).
- (b) For single compartment baghouses controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B- Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.2.6 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the stack exhausts from the baghouses and cyclones. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-8-4(10)]:

- (g) Fifty-one (51) steel MIG welding stations, each with a maximum wire consumption of 3.5 pounds per hour, utilizing a carbon steel E70S-6 electrode, 36 were constructed in 1995 and 15 in 1998, and exhausting into the building.
- (h) Six (6) aluminum MIG welding stations, each with a maximum wire consumption of 2.0 pounds per hour, utilizing an aluminum ER5356 electrode, constructed in 1995, and exhausting into the building.
- (i) Forty-one (41) oxyacetylene flame-cutting operations, each with a maximum cutting rate of 11.7 inches per minute for 0.75 inches thick steel, constructed in 1997, and exhausting into the building.

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

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

D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emission rate from the following: brazing equipment, cutting torches, soldering equipment, welding equipment with maximum process weight rates less than 100 pounds per hour shall not exceed 0.551 pounds per hour:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL CERTIFICATION

Source Name: Vestil Manufacturing Corporation
Source Address: 2999 North Wayne Street, Angola, Indiana 46703
Mailing Address: P.O. Box 507, Angola, IN 46703
FESOP Permit No.: F151-25501-00035

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)_____
- Report (specify)_____
- Notification (specify)_____
- Affidavit (specify)_____
- Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

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

Source Name: Vestil Manufacturing Corporation
Source Address: 2999 North Wayne Street, Angola, Indiana 46703
Mailing Address: P.O. Box 507, Angola, IN 46703
FESOP Permit No.: F151-25501-00035

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|--|

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Vestil Manufacturing Corporation
Source Address: 2999 North Wayne Street, Angola, Indiana 46703
Mailing Address: P.O. Box 507, Angola, Indiana 46703
FESOP No.: F151-25501-00035
Facility: Four (4) painting booths (B1, B2, B3, and B4) and two (2) glue application stations
Parameter: Total VOC delivered to the applicators and used for clean-up
Limit: Less than 98.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
 Deviations occurred in this quarter.
Deviations has been reported on: _____

Submitted By: _____
Title/Position: _____

Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Vestil Manufacturing Corporation
Source Address: 2999 North Wayne Street, Angola, Indiana 46703
Mailing Address: P.O. Box 507, Angola, Indiana 46703
FESOP No.: F151-25501-00035
Facility: Four (4) painting booths (B1, B2, B3, and B4) and two (2) glue application stations
Parameter: Total HAPs delivered VOC delivered to the applicators and used for clean-up
Limit: Less than 23.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
 Deviations occurred in this quarter.
Deviations has been reported on: _____

Submitted By: _____
Title/Position: _____

Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Vestil Manufacturing Corporation
Source Address: 2999 North Wayne Street, Angola, Indiana 46703
Mailing Address: P.O. Box 507, Angola, Indiana 46703
FESOP No.: F151-25501-00035
Facility: Four (4) painting booths (B1, B2, B3, and B4) and two (2) glue application stations
Parameter: A single HAP delivered to the applicators and used for clean-up
Limit: Less than 9.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted By: _____
Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Vestil Manufacturing Corporation
Source Address: 2999 North Wayne Street, Angola, Indiana 46703
Mailing Address: P.O. Box 507, Angola, IN 46703
FESOP Permit No.: F151-25501-00035

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

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

Source Background and Description

Source Name: Vestil Manufacturing Corporation
Source Location: 2999 North Wayne Street, Angola, Indiana 46703
County: Steuben
SIC Code: 3499 and 3999
Operation Permit No.: F151-25501-00035
Permit Reviewer: Janet Mobley

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Vestil Manufacturing Corporation relating to the operation of a stationary material handling and loading equipment manufacturing plant.

History

On November 5, 2007, Vestil Manufacturing Corporation submitted an application to the OAQ requesting to renew its operating permit. Vestil Manufacturing Corporation was issued FESOP Renewal F151-15780-00035 on November 21, 2002.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) spray paint booth, identified as B1, with a maximum capacity of 10 metal curbs per hour and a maximum paint usage of 0.2 gallons per curb, equipped with High Volume Low Pressure (HVLP) spray guns, using dry filters for overspray control, constructed in 1997, and exhausting to stack V1.
- (b) Three (3) spray paint booths, identified as B2, B3, and B4, each with a maximum capacity of 2 steel yard ramps per hour and a maximum paint usage of 4.0 gallons per ramp, equipped with High Volume Low Pressure (HVLP) spray guns, using dry filters for overspray control, constructed in 1995, and exhausting to stacks V2, V3, and V4, respectively.
- (c) Two (2) glue application stations, with a combined maximum capacity of 0.359 units per hour and a combined maximum glue usage of 0.2 gallons per unit, each utilizing a spray gun application, constructed in 1997, and exhausting into the building.
- (d) One (1) radial cross-cut woodsaw, identified as FS1, with a maximum throughput rate of 60 pounds of wood per hour, controlled by one (1) baghouse, constructed in 1995, and exhausting into the building.
- (e) One (1) radial arm 14" woodsaw, identified as FS2, with a maximum throughput rate of 60 pounds of wood per hour, controlled by one (1) cyclone and baghouse system, constructed in 1995, and exhausting into the building.

- (f) One (1) routing woodsaw, identified as FS3, with a maximum throughput rate of 60 pounds of wood per hour, controlled by one (1) cyclone and baghouse system, constructed in 1995, and exhausting into the building.
- (g) Fifty-one (51) steel MIG welding stations, each with a maximum wire consumption of 3.5 pounds per hour, utilizing a carbon steel E70S-6 electrode, 36 were constructed in 1995 and 15 in 1998, and exhausting into the building.
- (h) Six (6) aluminum MIG welding stations, each with a maximum wire consumption of 2.0 pounds per hour, utilizing an aluminum ER5356 electrode, constructed in 1995, and exhausting into the building.
- (i) Forty-one (41) oxyacetylene flame-cutting operations, each with a maximum cutting rate of 11.7 inches per minute for 0.75 inches thick steel, constructed in 1997, and exhausting into the building.

Unpermitted Emission Units and Pollution Control Equipment

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

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

There are no new emission units and pollution control equipment operating at this source during this review process.

Emission Units and Pollution Control Equipment Removed From the Source

There are no emission units that have been removed from the source since the previous permit.

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following indirect heating units: [326 IAC 6-2-4]
 - (1) Nine (9) natural gas-fired furnaces (identified as T2 through T8, and T14 through T16), each with a maximum heat input rate of 0.4 MMBtu/hr, constructed in 1995, and exhausting through stacks S2 through S8, and S14 through S16, respectively.
 - (2) Five (5) natural gas-fired furnaces (identified as C9 through C13), each with a maximum heat input rate of 0.154 MMBtu/hr, constructed in 1995, and exhausting through stacks S9 through S13, respectively.
 - (3) One (1) natural gas-fired heater, identified as W1, with a maximum heat input rate of 0.034 MMBtu/hr, constructed in 1995, and exhausting through stack WH1.
 - (4) One (1) natural gas-fired heater, identified as W2, with a maximum heat input rate of 0.44 MMBtu/hr, constructed in 1995, and exhausting through stack WH2.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour, including four (4) propane-fired fork lift trucks, identified as FT1 through FT4, with a total capacity of 56,000 Btu/hr.

- (c) Cleaners and solvents having a vapor pressure equal to or less than 2 kPa (15mm Hg or 0.3 psi) measured at 38 degrees C (100°F) or having a vapor pressure equal to or less than 0.7 kPa (5mm Hg or 0.1 psi) measured at 20°C (68°F). The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (e) Other emission units, not regulated by a NESHAP, with PM10 and SO₂ emissions less than five (5) pounds per hour or twenty-five (25) pounds per day, CO emissions less than twenty-five (25) pounds per day, lead emissions less than six-tenths (0.6) tons per year or three and twenty-nine (3.29) pounds per day, and emitting greater than one (1) pound per day but less than five (5) pounds per day or one (1) ton per year of a single HAP, or emitting greater than one (1) pound per day but less than twelve and five tenths (12.5) pounds per day or two and five tenths (2.5) ton per year of any combination of HAPs, including one (1) metal working shop, consisting of miscellaneous drills and cutting equipment, and exhausting inside the building.

Existing Approvals

The source has not received any other approvals since the previous permit FESOP F151-15780-00035, was issued on November 21, 2002. All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have either been incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

- (a) IDEM is aware that this FESOP renewal application was not submitted before March 20, 2007, which represents the date nine (9) months prior to the expiration date of the original FESOP. 326 IAC 2-8-3(h) requires that in order to be considered timely, a FESOP renewal application must be submitted at least nine (9) months prior to the expiration date of the current operating permit.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the operating permit rules.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 10).

County Attainment Status

The source is located in Steuben County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

(a) Ozone Standards

- (1) 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.
 - (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.
 - (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
 - (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Steuben County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Steuben County has been classified as attainment for PM_{2.5}. 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_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions.
- (c) Steuben County has been classified as attainment or unclassifiable in Indiana for other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ and VOC is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to continue to limit their PM₁₀ and VOC emissions to less than Title V levels, therefore the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-1.1-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. However, the source has agreed to limit their single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP.

- (d) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward determination of Part 70 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 (the latest and only year reported) OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not reported
PM ₁₀	0
SO ₂	Not reported
VOC	12
CO	Not reported
NO _x	Not reported
HAP (specify)	Not reported

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
One (1) Paint Booth B1	Less than 2.23	Less than 2.23	--	Less than 98.8	--	--	Less than 9.4 for a single HAP and less than 23.5 for combined HAPs
Three (3) Paint Booths B2, B3, and B4	Less than 26.8	Less than 26.8	--		--	--	
Two (2) Glue Stations	0.25	0.25	--		--	--	
Three (3) Woodworking Operations	Less than 0.24	Less than 0.24	--	--	--	--	--
Welding and Cutting Operations	38.0	38.0	--	--	--	--	0.12
NG Combustion Units (insignificant)	0.16	0.16	0.01	0.12	1.78	2.12	Negligible
Four (4) Lift Trucks (Insignificant)	Negligible	Negligible	Negligible	Negligible	0.04	0.01	Negligible

Process/Emission Unit	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Total PTE After Issuance	Less than 67.7	Less than 67.7	0.01	Less than 99.0	1.82	2.13	< 10 single HAP < 25 combined HAPs
TV Major	-	100	100	100	100	100	10/25
PSD Major	250	-	250	250	250	250	-

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not included in this permit. This source is operating as a FESOP. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.
- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (c) The source does not perform surface coating operations to metal furniture. Therefore, the New Source Performance Standards for Surface Coating of Metal Furniture (40 CFR Part 60.310 - 60.316, Subpart EE) are not applicable.
- (d) The source does not perform metal coil surface coating operations. Therefore, the New Source Performance Standards for Metal Coil Surface Coating (40 CFR Part 60.460 - 60.466, Subpart TT) are not applicable.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.
- (f) The source does not manufacture any wood furniture. Therefore, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Wood Furniture Manufacturing Operations (40 CFR Part 63, Subpart JJ) are not applicable to this source.

State Rule Applicability - Entire Source

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

The source was constructed in 1995 and modified in December, 1997. The source is not in 1 of 28 source categories defined in 326 IAC 2-2-1(y)(1) and the potential to emit of any regulated pollutant before control is less than two hundred and fifty (250) tons per year. Therefore, the requirements of 326 IAC 2-2 are not applicable.

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

The source was modified after July 27, 1997 and has the potential HAP emissions greater than the major HAP thresholds. However, the source has agreed to limit the HAP emissions from the entire source to less than 10 tons per year for a single HAP and less than 25 tons per year for any combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

326 IAC 2-8-4 (FESOP)

The potential VOC and PM₁₀ emissions from the entire facility are greater than 100 tons per year and the potential HAP emissions from the entire source are greater than 10 tons per year for a single HAP and greater than 25 tons per year for any combination of HAPs. The following limitations are included in this renewal:

- (a) The amount of VOC delivered to all the spray painting booths, the glue application stations, and their associated clean-up activities shall not exceed a total of 98.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The amount of any single HAP delivered to all the spray painting booths and the glue application stations plus the amount of any single HAP used for clean-up shall not exceed 9.4 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (c) The amount of any combination of HAPs delivered to all the spray painting booths and the glue application stations plus the amount of any combination of HAPs used for clean-up shall not exceed 23.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

The above limits for the surface coating activities, combined with the emissions from the woodworking, welding, flame cutting, and insignificant activities, limit both the VOC and PM₁₀ emissions from the entire source to less than 100 tons per year each and limit the HAP emissions to less than 10 tons per year for a single HAP, and less than 25 tons per year for any combination of HAPs. The use of dry filters for the spray booths (B1, B2, B3, and B4) ensures the PM₁₀ emissions from the entire source are less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Steuben 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 Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

State Rule Applicability - Four (4) Spray Painting Booths (B1, B2, B3, and B4)

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

These painting booths perform the metal coating process and the source is under the Standard Industrial Classification Code of major group #37. In addition, the source was constructed after

July 1, 1990 and each coating booth has actual VOC emissions greater than 15 pounds per day. Therefore, these booths are subject to 326 IAC 8-2-9 and they have the following requirements:

- (a) The VOC content of the coatings applied to this facility shall not exceed three and five tenths (3.5) pounds VOC per gallon of extreme performance coatings, excluding water, delivered to the applicators.
- (b) Solvent sprayed from the application equipment during clean-up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is completed, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the Permittee, the VOC content of the coating delivered to the spray painting booths is in compliance with the requirements above.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

Since the requirements of 326 IAC 8-2-9 apply to these painting booths, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is located in Steuben and was constructed after January 1, 1980. Therefore, the requirements of 326 IAC 8-6 are not applicable.

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

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the spray painting booths (B1, B2, B3, and B4) shall be limited by the following:

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

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

Particulate from these four (4) spray painting booths (B1, B2, B3, and B4) shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

State Rule Applicability - Two (2) Glue Application Stations

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

The actual VOC emissions from each of the glue application stations are less than 15 pounds per day. Therefore, the requirements of 326 IAC 8-2-9 are not applicable to these units. Any change or modification which may increase the actual VOC emissions from each glue application station to greater than 15 pounds per day must be approved by OAQ before any such change may occur.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The potential uncontrolled VOC emissions from each of the glue application stations are less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to these units.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is located in Steuben and was constructed after January 1, 1980. Therefore, the requirements of 326 IAC 8-6 are not applicable.

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

Pursuant to 326 IAC 6-3-2 the particulate matter (PM) from each of the glue application stations shall be limited by the following:

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

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

The coating usage for each of the glue application stations is less than 5 gallons per day. These two glue application stations are exempt from the requirements of 326 IAC 6-3-2.

State Rule Applicability - Three Woodworking Operations (FS1, FS2, and FS3)

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

The allowable particulate emissions from each woodworking operation shall be limited to 0.39 lbs/hr when the process weight rate is 60 lbs/hr.

The pounds per hour limitation was calculated using the following equation:

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

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

According to the emission calculations (see Appendix A), the potential to emit PM after control from each woodworking operation is less than the limit in the table above. Therefore, these woodworking operations are in compliance with 326 IAC 6-3-2. The use of baghouses with control efficiencies of 99% ensures compliance with the particulate limit above.

State Rule Applicability - Welding and Flame-Cutting Operations

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

The welding operations at this source consume more than 625 pounds of wire per day and the flame cutting operations process more than 3,400 inches per hour of stock. Therefore, the welding and cutting operations are subject to subject to 326 IAC 6-3. Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions from each of the welding and flame-cutting processes shall be limited the pounds per hour limitation calculated with the following equation:

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

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

Testing Requirements

No stack test is required for this source because compliance with the FESOP limits for VOC and HAP can be determined by evaluating MSDSs and keeping records of the amount of VOC and HAPs applied. The use of dry filters, baghouses, and cyclones ensures compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).

Compliance Requirements

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

1. The woodworking operations (FS1, FS2, and FS3), have applicable compliance monitoring conditions as specified below:
 - (a) Visible emissions notations of the stack exhausts from each baghouse or cyclone shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (b) An inspection shall be performed each calendar quarter of all cyclones controlling the paint booth operation. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.
 - (c) In the event that bag failure has been observed for the baghouses:
 - (a) For single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies requirements of the emergency provisions of this permit (Section B- Emergency Provisions).
 - (b) For single compartment baghouses controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B- Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

- (d) In the event that cyclone failure has been observed, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These conditions are necessary because the baghouses and cyclones, which are used to control the PM emissions from the woodworking operations, must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-8 (FESOP).

2. The spray painting booths (B1, B2, B3, and B4) have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray painting booth stacks (V1, V2, V3, and V4) while one or more of the booths are in operation.

The Response to Excursions or Exceedances Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emission is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filers must function properly to ensure compliance with 326 IAC 2-8 (FESOP).

Recommendation

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

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

An application for the purposes of this review was received on November 5, 2007.

Conclusion

The operation of this material handling products and loading dock equipment manufacturing plant shall be subject to the conditions of the attached FESOP Renewal No.: F151-25501-00035.

Appendix A: Emission Summary

Company Name: Vestil Manufacturing Corporation
 Address City IN Zip: 2999 North Wayne Street
 Permit No: F151-25501-00035
 Reviewer: Janet Mobley
 Date: February 27, 2008

Uncontrolled Emissions

Emission Units	PM	PM10	SO2	VOC	CO	NOx	HAPs
Paint Booth (B1)	11.16	11.16		8.61			
Paint Booth (B2, B3 and B4)	133.93	133.92		109.34			Single HAP Glycol Ether < 80 Single HAP <10 < 25 for Combined HAPs
Glue Stations	0.25	0.25		2.42			
Woodworking Operations	23.89	23.89					
Welding and Cutting	37.98	37.98					
NG Combustion Units	0.16	0.16	0.01	0.12	1.78	2.12	
Lift Trucks Insignificant Activities	1.10E-03	1.10E-03	2.70E-06		0.01	0.04	
Totals	207.4	207.4	0.01	120.5	1.79	2.16	92.8

Controlled Emissions

Emission Units	PM	PM10	SO2	VOC	CO	NOx	HAPs
Paint Booth (B1)	<2.23	<2.23					<9.4 Single HAP <23.5 Total HAPs
Paint Booth (B2, B3 and B4)	<26.8	<26.8		<98.8			
Glue Stations	0.25	0.25					
Woodworking Operations	<0.24	<0.24					
Welding and Cutting	38	38					0.12
NG Combustion Units	0.16	0.16	0.01	0.12	1.78	2.12	Negligible
Lift Trucks Insignificant Activities	Negligible	Negligible	Negligible	Negligible	0.04	0.01	Negligible
Totals	<67.7	<67.7	0.01	<99.0	1.82	2.13	<10 for a single HAP <25 for combined HAPS

**Appendix A: Emission Calculations
VOC and PM/PM10 Emissions
From the Spray Paint Booth B1**

**Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703
FESOP: F151-25501-00035
Reviewer: Janet Mobley
Date: February 27, 2008**

Material	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	*PM/PM10 Potential (lb/hr)	*PM/PM10 Potential (ton/yr)	Transfer Efficiency	PM/PM10 Control Efficiency	Potential to Emit PM/PM10 (lb/hr)	Potential to Emit PM/PM10 (tons/yr)
Yellow Gloss	9.1	60.00%	49.2%	10.8%	10.0	0.2	0.98	1.97	47.17	8.61	2.55	11.16	65%	80%	0.51	2.23
Total								1.97		8.61	2.55	11.16			0.51	2.23

*Assume all the PM emissions are PM10 emissions.

METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit)

Potential VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (24 hr/day)

Potential VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (8760 hr/yr) * (1 ton/2000 lbs)

Potential PM/PM10 (lbs/hr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1 - Weight % Volatile) * (1 - Transfer efficiency)

Potential PM/PM10 (tons/yr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1 - Weight % Volatile) * (1 - Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Potential to Emit PM/PM10 (lbs/hr) = Potential PM/PM10 (lbs/hr) * (1 - PM/PM10 Control Efficiency)

Potential to Emit PM/PM10 (tons/yr) = Potential PM/PM10 (lbs/hr) * (1 - PM/PM10 Control Efficiency) * (8760 hr/yr) * (1 ton/2000 lbs)

**Appendix A: Emission Calculations
HAP Emissions
From the Spray Paint Booth B1**

**Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703
FESOP: F151-25501-00035
Reviewer: Janet Mobley
Date: February 27, 2008**

Material	Density (Lb/Gal)	Maximum Throughput (unit/hr/booth)	Maximum Usage (gal/unit)	Weight % Dibutyl Phthalate	Dibutyl Phthalate Emissions (tons/yr)	Weight % Glycol Ethers	Glycol Ethers Emissions (tons/yr)
Yellow Gloss	9.1	10.0	0.2	0.83%	0.66	7.30%	5.82
Total					0.66		5.82

Total HAPs

6.48 tons/yr

METHODOLOGY

HAPs emission rate (tons/yr) = Density (lb/gal) x Max. Throughput (unit/hr) * Max. Usage (gal/unit) x Weight % HAP x 8760 hr/yr x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC and PM/PM10 Emissions
From Three (3) Spray Paint Booths (B2, B3, and B4)

Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703
FESOP: F151-25501-00035
Reviewer: Janet Mobley
Date: February 27, 2008

Material	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Maximum Throughput (unit/hr/booth)	Maximum Usage (gal/unit)	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	*PM/PM10 Potential (lb/hr)	*PM/PM10 Potential (ton/yr)	Transfer Efficiency	PM/PM10 Control Efficiency	Potential to Emit PM/PM10 (lb/hr)	Potential to Emit PM/PM10 (tons/yr)
Yellow Gloss	9.1	60.00%	49.2%	10.8%	2.0	4.0	0.98	7.86	188.70	34.44	10.19	44.64	65%	80%	2.04	8.93
Blue Gloss	9.0	60.02%	48.6%	11.4%	2.0	4.0	1.03	8.22	197.34	36.01	10.07	44.13	65%	80%	2.01	8.83
Brown Gloss	9.1	60.03%	48.6%	11.4%	2.0	4.0	1.04	8.32	199.70	36.45	10.18	44.61	65%	80%	2.04	8.92
**Total for each booth (worst case)								8.32		36.45	10.19	44.64			2.04	8.93
Total for 3 booths										109.34		133.92				26.78

*Assume all the PM emissions are PM10 emissions.

** Only one type of coating can be applied for each booth at the same time. Therefore, the worst case scenario is using the highest VOC/PM content coating.

METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit)

Potential VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (24 hr/day)

Potential VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (8760 hr/yr) * (1 ton/2000 lbs)

Potential PM/PM10 (lbs/hr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1 - Weight % Volatile) * (1 - Transfer efficiency)

Potential PM/PM10 (tons/yr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1 - Weight % Volatile) * (1 - Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Potential to Emit PM/PM10 (lbs/hr) = Potential PM/PM10 (lbs/hr) * (1 - PM/PM10 Control Efficiency)

Potential to Emit PM/PM10 (tons/yr) = Potential PM/PM10 (lbs/hr) * (1 - PM/PM10 Control Efficiency) * (8760 hr/yr) * (1 ton/2000 lbs)

**Appendix A: Emission Calculations
HAP Emissions
From Three (3) Spray Paint Booths (B2, B3, and B4)**

**Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703
FESOP: F151-25501-00035
Reviewer: Janet Mobley
Date: February 27, 2008**

Material	Density (Lb/Gal)	Maximum Throughput (unit/hr/booth)	Maximum Usage (gal/unit)	Weight % Dibutyl Phthalate	Dibutyl Phthalate Emissions (tons/yr)	Weight % Glycol Ethers	Glycol Ethers Emissions (tons/yr)
Yellow Gloss	9.1	2.0	4.0	0.83%	2.65	7.30%	23.28
Blue Gloss	9.0	2.0	4.0	0.89%	2.81	7.91%	24.94
Brown Gloss	9.1	2.0	4.0	0.88%	2.81	7.54%	24.04
*Total for each booth (worst case)					2.81		24.94
Total for 3 booths					8.42		74.83

* Only one type of coating can be applied for each booth at the same time. Therefore, the worst case scenario is using the highest HAP content coating.

Total HAPs

83.26 tons/yr

METHODOLOGY

HAPs emission rate (tons/yr) = Density (lb/gal) x Max. Throughput (unit/hr) * Max. Usage (gal/unit) x Weight % HAP x 8760 hr/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
VOC and PM/PM10 Emissions
From Two(2) Glue Application Stations**

**Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703
FESOP: F151-25501-00035
Reviewer: Janet Mobley
Date: February 27, 2008**

Material	Density (Lb/Gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Maximum Throughput (unit/hr)	Maximum Usage (gal/unit)	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	*PM/PM10 Potential (lb/hr)	*PM/PM10 Potential (ton/yr)	Transfer Efficiency
Flexible Foam Adhesive	10.0	77.00%	0.0%	77.0%	0.359	0.2	7.70	0.55	13.27	2.42	0.06	0.25	65%
Total								0.55		2.42	0.06	0.25	

*Assume all the PM emissions are PM10 emissions.

METHODOLOGY

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit)

Potential VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (24 hr/day)

Potential VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit) * (8760 hr/yr) * (1 ton/2000 lbs)

Potential PM/PM10 (lbs/hr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency)

Potential PM/PM10 (tons/yr) = Max. Throughput (unit/hr) * Max. Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

**Appendix A: Emission Calculations
HAP Emissions
From Two(2) Glue Application Stations**

**Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703
FESOP: F151-25501-00035
Reviewer: Janet Mobley
Date: February 27, 2008**

Material	Density (Lb/Gal)	Maximum Throughput (unit/hr/booth)	Maximum Usage (gal/unit)	Weight % Perchloroethylene	Perchloroethylene Emissions (tons/yr)	Weight % Dichloromethane	Dichloromethane Emissions (tons/yr)	Weight % Toluene	Toluene Emissions (tons/yr)
Flexible Foam Adhesive	10.0	0.359	0.2	15.0%	0.47	65.0%	2.04	10.0%	0.31
Total					0.47		2.04		0.31

Total HAPs

**2.83
tons/yr**

METHODOLOGY

HAPs emission rate (tons/yr) = Density (lb/gal) x Max. Throughput (unit/hr) * Max. Usage (gal/unit) x Weight % HAP x 8760 hr/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
PM/PM10 Emissions
From Woodworking Operations (FS1, FS2, FS3)**

**Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703
FESOP: F151-25501-00035
Reviewer: Janet Mobley
Date: February 27, 2008**

Woodworking Process Description:

Units: One Radial Cross Cut Saw (SF1), One Radial Arm Saw (SF2), and One Routing Saw (SF3)
 Max. Throughput Rate: 60 pounds of wood per unit
 PM Control Equipment: baghouses
 Dust collected: 1.8 lbs/hr/unit
 Control Efficiency: 99.0%

1. Potential Uncontrolled Emissions for each unit:

Hourly PM/PM10 Emissions	= 1.8 lbs/hr / 99% =	1.82 lbs/hr/unit
Annual PM/PM10 emissions	= 1.82 lbs/hr x 8760 hr/yr x 1/2000 (ton/lb) =	7.96 tons/yr/unit

2. Potential to Emit after Control for each unit:

Hourly Potential to Emit	= 1.82 lbs/hr x (1 - 99%) =	0.02 lbs/hr/unit
Annual Potential to Emit	= 1.82 lbs/hr x (1 - 99%) x 8760 hr/yr x 1 ton/2000 lbs =	0.08 tons/yr/unit

3. Total Emissions from Woodworking Operations:

Potential Uncontrolled PM/PM10 Emissions	= 7.96 tons/yr/unit x 3 units =	23.89 tons/yr
Potentail to Emit of PM/PM10	= 0.08 tons/yr/unit x 3 units =	0.24 tons/yr

Note: This emission calculations for woodworking process is copied from the Technical Support Document (TSD) for FESOP # 151-8993-00035, issued March 25, 98.

**Appendix A: Emission Calculations
PM and HAP Emissions
From Welding and Flame Cutting Operations**

**Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703
FESOP: F151-25501-00035
Reviewer: Janet Mobley
Date: February 27, 2008**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				Total HAPS (lbs/hr)	
			PM=PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
WELDING												
Metal Inert Gas (MIG)(carbon steel)	51	3.5		0.0241	0.000034		0.00001	4.302	0.006	0	0.001785	0.008
Metal Inert Gas (MIG)(aluminum)	6	2.0		0.0723	0.000034		0.00001	0.868	0.000	0	0.00012	0.001

FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS* (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				Total HAPS (lbs/hr)
				PM=PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	41	0.75	11.7	0.1622	0.0005	0.0001	0.0003	3.501	0.011	2.2E-03	0.006	0.019

EMISSION TOTALS	PM = PM10	Mn	Ni	Cr	Total HAPS
Potential Emissions (lbs/hr)	8.67	0.017	0.002	0.008	0.03
Potential Emissions (lbs/day)	208.10	0.414	0.052	0.201	0.67
Potential Emissions (tons/year)	37.98	0.076	0.009	0.037	0.12

METHODOLOGY

Welding emissions (lb/hr) = (# of stations) x (max. lbs of electrode used/hr/station) x (emission factor, lb. pollutant/lb. of electrode used)
 Cutting emissions (lb/hr) = (# of stations) x (max. metal thickness, in.) x (max. cutting rate, in./min.) x (60 min./hr.) x (emission factor, lb. pollutant/1,000 in. cut, 1" thick)
 Plasma cutting emissions (lb/hr) = (# of stations) x (max. cutting rate, in./min.) x (60 min./hr.) x (emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)
 Emissions (lbs/day) = emissions (lbs/hr) x 24 hrs/day
 Emissions (tons/yr) = emissions (lb/hr) x 8,760 hrs/year x 1 ton/2,000 lbs.

**Appendix A: Emission Calculations
Natural Gas Combustion
(MMBtu/hr < 100)
From Insignificant Combustion Units**

**Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703
FESOP: F151-25501-00035
Reviewer: Janet Mobley
Date: February 27, 2008**

Heat Input Capacity
MMBtu/hr
4.84 (16 Units combined)

Potential Throughput
MMCF/yr
42.4

	Pollutant					
Emission Factor in lb/MMCF	PM*	PM10*	SO ₂	**NO _x	VOC	CO
	7.6	7.6	0.6	100	5.5	84.0
Potential Emission in tons/yr	0.16	0.16	0.01	2.12	0.12	1.78

*PM and PM10 emission factors are condensable and filterable PM10 combined.

**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x 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 from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (AP-42 Supplement D 3/98)

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

Appendix A: Emission Calculations

From Four (4) Propane Fired Fork Lift Trucks (FT1-FT4) (Insignificant)

Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 N. Wayne St., Angola, IN 46703
FESOP: F151-25501-00035
Reviewer: Janet Mobley
Date: February 27, 2008

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	Sulfur Content (gr/100 ft ³)
0.056 (total for 2 trucks)	5.4	0.01

	Pollutant					
Emission Factor in lb/kgal	PM*	PM10*	SO ₂	NO _x	VOC	CO
	0.4	0.4	0.001 (0.10S)	14	0.5	1.9
Potential Emission in tons/yr	1.1E-03	1.1E-03	2.7E-06	0.04	1.3E-03	0.01

*PM and PM10 emission factors are condensable and filterable PM10 combined.

Methodology

1 gallon of propane has a heating value of 91,500 Btu.

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 kgal/1,000 gal x 1 gal/0.0915 MMBtu

Emission Factors from AP-42, Chapter 1.5-1, Table 1.5-1, SCC #1-03-010-02.(AP-42 Supplement B 10/96)

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