



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: July 27, 2009

RE: Dragon/ESP-Midwest, Ltd. / 049-27195-00008

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

**Dragon/ESP-Midwest, Ltd.**  
**8857 East State Road 14**  
**Akron, Indiana 46910**

(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.: F049-27195-00008	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 27, 2009  Expiration Date: July 27, 2019

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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)]

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The Permittee owns and operates a stationary metal fabricating facility.

Source Address:	8857 East State Road 14, Akron, Indiana 46910
Mailing Address:	P.O. Box 790, Beaumont, Texas 77704
General Source Phone Number:	(574) 893-1569
SIC Code:	3444
County Location:	Fulton
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) paint room, identified as EU-01, constructed in 2004, consisting of two (2) paint booths, each equipped with one (1) airless spray applicator, with a combined maximum capacity to paint 0.625 metal fractionation tanks or 1.250 metal containers per hour, using dry filters (CE-1, CE-3) for particulate control, and exhausting to Stacks S-1 and S-3, respectively.
- (b) One (1) grit blast booth, identified as EU-02, constructed in 2004, with a maximum capacity to clean 3,320 pounds of steel per hour, equipped with a cartridge dust collector, identified as CE-2, for particulate control, and exhausting to Stack S-2.

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

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This stationary source also includes the following insignificant activities:

- (c) One (1) welding, cutting and assembly process, constructed in 2004, with a maximum capacity of 16,000 pounds of steel per hour, exhausting to general ventilation, and consisting of the following equipment:
  - (1) Fifty-five (55) Metal Inert Gas (MIG) welding stations, identified as W1-W55, each with a maximum capacity to use three (3.0) pounds of wire per station per hour.
  - (2) Ten (10) oxyacetylene flame-cutting stations, identified as AFC1 - AFC10, each with a maximum capacity to cut 20.0 inches of 0.25 inch thick metal per minute.
  - (3) One (1) plasma flame-cutting station, identified as PFC1, with a maximum capacity to cut 20.0 inches of 1.00 inch thick metal per minute.

- (d) Propane or liquefied petroleum gas, or butane-fired combustion sources with a maximum heat input equal to or less than six million (6,000,000) British thermal units per hour (MMBtu/hr), consisting of:
  - (1) Two (2) space heaters, identified as H-1 and H-2, firing propane gas, with a maximum capacity: 0.1 million British thermal units per hour (MMBtu/hr), each.
  - (2) One (1) space heater, identified as H-3, firing propane gas, with a maximum capacity: 0.3 million British thermal units per hour (MMBtu/hr).
- (e) A petroleum fuel, other than gasoline, dispensing facility, having a total maximum storage capacity of seven thousand seven hundred fifty (7,750) gallons; consisting of:
  - (1) two (2) diesel storage tanks, identified as T-3 & T-4, T-3 was constructed in 2003, T-4 was constructed in 2006, each has a maximum storage capacity of two hundred fifty (250) gallons, each dispensing less than or equal to three hundred twenty (320) gallons per month;
  - (2) one (1) kerosene storage tank, constructed in 2001, identified as T-1, having a maximum storage capacity of two hundred fifty (250) gallons, and dispensing less than or equal to five hundred fifteen (515) gallons per winter
  - (3) seven (7) LPG pressurized storage tanks, identified as LP-1 - LP-7, four (4) tanks were constructed in 1998 & three (3) tanks were constructed in 2001, each having a maximum storage capacity of one (1) thousand gallons.
- (f) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (h) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

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

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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]

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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)]

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- (a) This permit, F049-27195-00008, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

### B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

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

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

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

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

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

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

B.8 Certification [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 and Enforcement 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 (PMP) 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 PMP 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 PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP 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, and Northern Regional Office 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 and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Compliance and Enforcement Branch)

Facsimile Number: 317-233-6865  
Northern Region 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 and Enforcement 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. Any emergencies that have been previously reported pursuant to paragraph (b)(5) of this condition and certified by an "authorized individual" need only be referenced by the date of the original report.

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

- (a) All terms and conditions of permits established prior to F049-27195-00008 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 and Enforcement Branch, 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]

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- (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)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. 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  
Permit Administration and Support Section, 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]**

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- (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  
Permit Administration and Support Section, 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]**

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- (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  
Permit Administration and Support Section, 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]**

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

**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]**

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

- (a) Enter upon the Permittee's premises where a 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  
Permit Administration and Support Section, 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) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

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

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

#### C.3 Opacity [326 IAC 5-1]

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

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

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

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

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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]

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

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

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

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

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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]

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolitions 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  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 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]**

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

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

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, 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]**

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

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

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

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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 or ninety (90) days of initial start-up, whichever is later. 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 and Enforcement 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)]**

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

alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

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

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

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

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

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; 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.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

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

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

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

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

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

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

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

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, 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.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) paint room, identified as EU-01, constructed in 2004, consisting of two (2) paint booths, each equipped with one (1) airless spray applicator, with a combined maximum capacity to paint 0.625 metal fractionation tanks or 1.250 metal containers per hour, using dry filters (CE-1 & CE-3) for particulate control, and exhausting to Stacks S-1 and S-3, respectively.
- (b) One (1) grit blast booth, identified as EU-02, constructed in 2004, with a maximum capacity to clean 3,320 pounds of steel per hour, equipped with a cartridge dust collector, identified as CE-2, for particulate control, and exhausting to Stack S-2.

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

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

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

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicators at the paint room (EU-01).

#### D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the paint room (EU-01) during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the paint room (EU-01) shall be controlled using dry particulate filters (CE-1 & CE-3), and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

#### D.1.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the grit blast booth (EU-02) shall not exceed 5.76 pounds per hour when operating at a process weight rate of 3,320 pounds per hour (1.66 tons per hour).

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

Interpolation of the data for the process weight rate up to 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.1.5 VOC and HAP Limits [326 IAC 2-8-4]

- (a) The total amount of xylene delivered to the applicators at the paint room (EU-01), including coatings, adhesives, dilution solvents and clean-up solvents, shall be limited to less than nine and nine-tenths (9.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The total amount of all VOC delivered to all applicators at the paint room (EU-01), including coatings, adhesives, dilution solvents, and cleaning solvents shall be limited to

less than ninety-five (95.0) tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits, in conjunction with the limited PTE from all other emission units at this source, shall limit the source wide VOC emissions to less than one hundred (100) tons per twelve (12) consecutive month period; the xylene emissions to less than ten (10) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Operating Permits) and 326 IAC 2-4.1 (Major Sources of HAP) not applicable.

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

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the paint room (EU-01), the grit blast booth (EU-02), and each associated control device, (CE-1, CE-2 & CE-3).

**Compliance Determination Requirements**

**D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]**

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Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.5 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.

**D.1.8 Particulate Control [326 IAC 2-8-5(a)(4)][326 IAC 2-8-13(c)(7)]**

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- (a) In order to comply with Condition D.1.3, and pursuant to 326 IAC 2-8-13(c)(7), the permittee shall:
- (1) Operate the filter systems, identified as CE-1 & CE-3, for particulate control and to control emissions from the paint room (EU-01) at all times when the paint room is in operation and for an additional thirty (30) minutes after each painting job has ceased.
  - (2) Replace paint booth filters once per week during full production or, during less than full production, whenever the filters become clogged.
  - (3) Verify the doors to the paint booth are closed at all times when the paint booth is in operation until each painting job has ceased.
- (b) In order to comply with Condition D.1.4, the permittee shall:
- (1) Operate the cartridge dust collector, identified as CE-2, for particulate control and to control emissions from the grit blast booth (EU-02) at all times when the booth is in operation.
  - (2) Verify the door to the grit blast booth (EU-02) is closed at all times when the booth is in operation.
- (c) In the event that cartridge failure is observed in a multi-compartment dust collector, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ, of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

### D.1.9 Monitoring

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

### D.1.10 Visible Emissions Notations

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- (a) Visible emission notations of the grit blast booth (EU-02) stack exhaust (S-2) shall be performed once per day 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.1.11 Parametric Monitoring

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The Permittee shall record the pressure drop across the cartridge dust collector (CE-2) used in conjunction with the grit blast booth (EU-02), at least once per day when the booth is in operation. When for any one reading, the pressure drop across the cartridge dust collector is outside the normal range of 5.0 to 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

#### D.1.12 Broken or Failed Cartridge Detection

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- (a) For a single compartment dust collector controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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).
- (b) For a single compartment dust collector 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 emissions 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).

Cartridge failure can be indicated by a significant drop in the dust collectors' 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.1.13 Operator Training Requirements

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- (a) The Permittee shall implement an operator-training program.
  - (1) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of this permit if training was not completed within the last twelve (12) months. All new operators shall be trained within thirty (30) days of hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
  - (3) All operators shall be given refresher training annually.

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

#### D.1.14 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.1, D.1.5(a), and D.1.5(b), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and usage limits and the HAP content and usage limits established in Conditions D.1.1, D.1.5(a), and D.1.5(b).
  - (1) The VOC, HAP, and solids content of each coating material and solvent used.
  - (2) The amount of coating material and solvent less water used on monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

- (3) The cleanup solvent usage for each month.
- (4) The total VOC and total single HAP usage for each month.
- (5) The total VOC and total single HAP usage for each compliance period.
- (b) To document compliance with Condition D.1.8(a), the Permittee shall maintain a log of filter replacements in CE-1 & CE-3.
- (c) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections of the filters CE-1 & CE-3.
- (d) To document compliance with Condition D.1.10, the Permittee shall maintain daily records of visible emission notations of the grit blast booth (EU-02) stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).
- (e) To document compliance with Condition D.1.11, the Permittee shall maintain daily records of the pressure drop across the cartridge filter (CE-2) controlling the grit blast booth (EU-02), during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).
- (f) To document compliance with Condition D.1.13, the Permittee shall maintain a copy of the operator-training program and training records.
- (g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.15 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.5(a) and D.1.5(b), shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT  
(FESOP)  
CERTIFICATION**

Source Name: Dragon/ESP-Midwest, Ltd.  
Source Address: 8857 East State Road 14, Akron, Indiana 46910  
Mailing Address: P.O. Box 790, Beaumont, Texas 77704  
FESOP Permit No.: F049-27195-00008

**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 AND ENFORCEMENT BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: (317) 233-0178  
Fax: (317) 233-6865**

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

Source Name: Dragon/ESP-Midwest, Ltd.  
Source Address: 8857 East State Road 14, Akron, Indiana 46910  
Mailing Address: P.O. Box 790, Beaumont, Texas 77704  
FESOP Permit No.: F049-27195-00008

**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"><li>• 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</li><li>• 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</li></ul> |
|--|

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 <sub>10</sub> , SO <sub>2</sub> , VOC, NO <sub>x</sub> , 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 AND ENFORCEMENT BRANCH**

# FESOP Quarterly Report

Source Name: Dragon/ESP-Midwest, Ltd.  
Source Address: 8857 East State Road 14, Akron, Indiana 46910  
Mailing Address: P.O. Box 790, Beaumont, Texas 77704  
FESOP Permit No.: F049-27195-00008  
Facility: One (1) paint room (EU-01)  
Parameter: Total VOC usage  
Limit: Less 95.0 tons VOC per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: \_\_\_\_\_

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

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

# FESOP Quarterly Report

Source Name: Dragon/ESP-Midwest, Ltd.  
Source Address: 8857 East State Road 14, Akron, Indiana 46910  
Mailing Address: P.O. Box 790, Beaumont, Texas 77704  
FESOP Permit No.: F049-27195-00008  
Facility: One (1) paint room (EU-01)  
Parameter: Xylene (Individual HAP) usage  
Limit: Less than 9.9 tons of xylene compounds per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: \_\_\_\_\_

Month	Xylene Usage (tons)	Xylene Usage (tons)	Xylene Usage (tons) (Column 1 + Column 2)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

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

Source Name: Dragon/ESP-Midwest, Ltd.  
Source Address: 8857 East State Road 14, Akron, Indiana 46910  
Mailing Address: P.O. Box 790, Beaumont, Texas 77704  
FESOP Permit No.: F049-27195-00008

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>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

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

<b>Source Background and Description</b>
--

<b>Source Name:</b>	<b>Dragon/ESP-Midwest, Ltd.</b>
<b>Source Location:</b>	<b>8857 East State Road 14, Akron, Indiana 46910</b>
<b>County:</b>	<b>Fulton</b>
<b>SIC Code:</b>	<b>3444</b>
<b>Permit Renewal No.:</b>	<b>049-27195-00008</b>
<b>Permit Reviewer:</b>	<b>Sandra Carr</b>

On April 23, 2009, the Office of Air Quality (OAQ) had a notice published in Rochester Sentinel newspaper, in Rochester, Indiana, stating that Dragon/ESP-Midwest, Ltd. had applied to renew their Federally Enforceable State Operating Permit (FESOP) to continue to operate a stationary metal fabricating and coating facility. The notice also stated that the OAQ proposed to issue a FESOP Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On Thursday, June 18, 2009, a public meeting was held at the Akron Public Library, 205 East Rochester St, Akron, Indiana. IDEM staff described the draft Dragon/ESP-Midwest, Ltd air permit and answered questions from citizens. There were thirty citizens in attendance including representatives from IDEM and the local media. The comment period for the permit was extended to close of business on Monday, June 22, 2009 so that comments or responses from the public meeting could be submitted to IDEM OAQ.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

<b>Comments and Responses</b>
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Dennis & Sara Grinstead, Douglas & Jill Sampsel, Mary Eryman, David & Susan Weber, William Eryman, Norman & Kathy Prater, Richard & Marjorie Ludwig, and Steve Bell submitted written comments to IDEM, OAQ on the draft FESOP Renewal for Dragon/ESP-Midwest, Ltd.

**Comment 1:**

Residents living on properties adjacent to the Dragon/ESP-Midwest, Ltd. plant in Akron, Indiana expressed health concerns regarding the fumes and particulates in the air around their homes. Symptoms such as burning eyes, respiratory distress, headaches, and other serious health problems were reported by these residents. Several of the residents requested that IDEM hold a public hearing.

**Response to Comment 1:**

During the permit renewal review process, Dragon/ESP-Midwest, Ltd. was determined to be in compliance with all applicable rules. This Federally Enforceable State Operating Permit renewal contains conditions

that will ensure that Dragon/ESP-Midwest, Ltd. remains in compliance with these rules. New conditions were generated during this review as part of the permit review process for renewals and additional requirements were added to existing requirements as necessary to ensure compliance with the applicable state and Federal rules.

As indicated in the Technical Support Document (TSD), Fulton County is attainment for all the National Ambient Air Quality Standards. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

The Federal Clean Air Act requires the United States Environmental Protection Agency (U.S. EPA) to set National Ambient Air Quality Standards (NAAQS) for six criteria pollutants. These criteria pollutants are carbon monoxide (CO), lead (Pb), sulfur dioxide (SO<sub>2</sub>), particulate matter to a diameter of 2.5 microns (PM<sub>2.5</sub>), nitrogen oxides (NO<sub>x</sub>) and ground level ozone. More information about each of these pollutants is available at <http://www.epa.gov/air/airpollutants.html> on U.S. EPA's website. The U.S. EPA sets these standards at levels that protect human health, which is why the NAAQS are often referred to as the federal health standards for outdoor air. The NAAQS limit for all criteria pollutants is set low enough to protect the health of even the most sensitive persons, such as children, the elderly, and people with preexisting health conditions, such as asthma, bronchitis and cardiovascular disease. Each NAAQS also has a secondary standard. Secondary standards set limits to protect public welfare, including protection against visibility impairment, damage to animals, crops, vegetation, and buildings. The complete table of the NAAQS for all six criteria pollutants can be found at the <http://www.epa.gov/air/criteria.html> website. EPA's website <http://www.epa.gov/air/urbanair/6poll.html> provides more detailed information about the health effects of these six common air pollutants and why they are regulated.

The federal Clean Air Act requires the U.S. EPA to determine whether the ambient air in any area of the United States fails to meet any of the National Ambient Air Quality Standards (NAAQS). Any area that fails to meet one or more of the NAAQS will be designated as in "nonattainment" for that pollutant. Large air pollution sources in a nonattainment area are subject to additional regulations and the U.S. EPA may require that additional steps be taken that will result in the area meeting the NAAQS. The federal standard for ozone was strengthened on March 12, 2008. In 2010, the U.S. EPA will designate the areas that do not meet the new ozone standard. The U.S. EPA works with Indiana, Illinois and Kentucky in monitoring air pollution levels and in determining when air pollution modeling is needed.

IDEM conducts sampling of the ambient air at monitoring stations around Indiana. These air monitoring stations measure the concentration of pollutants to determine whether the NAAQS requirements are being met. Information about Indiana's air monitoring system and monitoring results are available at <http://www.in.gov/idem/programs/air/amb/index.html>. Information about current and expected air pollution levels are on IDEM's SmogWatch site at <http://www.in.gov/apps/idem/smog/> on the internet.

There is an inspector assigned to this source that has and will routinely inspect Dragon/ESP-Midwest, Ltd. for compliance with each condition listed in the D section of this permit. These inspections are unannounced and there will be appropriate actions taken if Dragon/ESP-Midwest, Ltd. is found to be in violation of any conditions in this Federally Enforceable State Operating Permit.

IDEM, OAQ will continue to inspect the plant to determine if the source is adequately controlling emissions and ensure compliance with its permit and Indiana regulations. Any citizen observing a possible violation of the plant's permit should immediately file a complaint with IDEM. Citizens may make a complaint about any air pollution concern by contacting the Fulton County IDEM OAQ Compliance Inspector:

David North  
Indiana Department of Environmental Management  
100 North Senate Avenue  
MC-61-53 IGCN 1003  
Indianapolis, IN 46204-2551  
Ph: 574-546-4891  
Email: [dnorth@idem.in.gov](mailto:dnorth@idem.in.gov)

by submitting a complaint online at <http://www.in.gov/idem/4174.htm>, by contacting IDEM's Complaint Coordinator at (800) 451-6027, extension 24464, or by sending a written complaint to:

IDEM  
Attn: Complaint Coordinator  
100 North Senate Avenue  
MC 50-03 IGCN 1313  
Indianapolis, IN 46204-2251.

The Office of Air Quality's Compliance Inspector will respond to any citizen complaints of visible emissions, fugitive dust, or other air pollution concern regarding the facility by doing a complaint inspection. In every inspection, whether the result of a complaint or not, the IDEM OAQ compliance inspector will monitor the facility to determine if it is complying with the permit.

In the past 3 years, IDEM has performed 4 inspections at the Dragon/ESP plant in Fulton County. The inspector prepares a written report of each inspection. Copies of inspection reports can be obtained by using IDEM's Virtual File Cabinet found at <http://www.in.gov/idem/4101.htm>, or by contacting the Director of the IDEM Central file room at 317-234-0111.

Dragon has cooperated with IDEM & EPA investigations and inspections to resolve complaint issues with its neighbors. They have responded to citizen complaints by acting to minimize noise, harsh lighting, odors, and particulates in this rural setting. The following is a list of the initiatives by Dragon:

- (1) Constructed earth mounds to act as noise barrier, and later, extended these mounds
- (2) Landscaped the earth mounds
- (3) Landscaped highway 14 plant entry
- (4) Moved and changed the outside security lighting
- (5) Constructed and put in service an additional paint booth
- (6) Changed the process of rolling tank floors
- (7) Switched to Hazardous Air Pollutant (HAP) free coating
- (8) Added carbon media filters to the paint booths
- (9) Initiated use of water based undercoat
- (10) Installed sound dampening on forklift backup alarms
- (11) Raised the exhaust stacks from the paint booths by 12 feet each
- (12) Tested new spray painting equipment designed to improve transfer efficiency
- (13) Changed the flow of the production line to dampen noise toward eastern side of the facility
- (14) Changed work practices to require all doors on the North and East sides remain closed between 5 pm. and 6:30 am, except during material handling
- (15) Stopped using Xylene (HAP) as a cleanup solvent and switched to a non-HAP cleaner
- (16) Added a production line on dayshift to lessen the total afternoon shift employees
- (17) Changed work practices to require all paint booth exhaust fans be operated for an additional 30 minutes to further disperse curing fumes
- (18) Replaced the coating used to topcoat the tanks with a more environmentally friendly coating
- (19) Changed work practices to require monitoring of the times the exhaust fans are operated
- (20) Voluntarily performed a stack test to verify compliance with IDEM & EPA air pollutant requirements

- (21) Added an odorizer to the topcoat
- (22) Provided a bucket truck to allow Fulton County Area Planning Commission Board members to inspect for signs of overspray in or on paint booth exhaust stacks
- (23) Experimented with running alternating exhaust fans in paint booth
- (24) Solicited vendor quotes for lowering and re-routing paint booth exhaust stacks
- (25) Continued research for more environmentally friendly coatings
- (26) Solicited vendor quotes for acoustical panels for weld shop
- (27) Plan to switch to forklifts with flashing light alarms instead of audible alarms when current forklift contract expires.

In addition, in an effort to demonstrate their commitment to Fulton County and its citizens, Dragon/ESP has agreed to perform the following:

- (1) Provide spray painter/operator training and annual refreshers to their employees in accordance with the EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines;
- (2) Keep paint booth door closed when painting is occurring;
- (3) Keep blast booth door closed when blasting is occurring; and
- (4) Record of when paint booth exhaust filters are changed.

These additional protective actions have been added to the final permit.

The OAQ is aware of the difficulties that can arise in neighborhoods which are shared by industries and homeowners. Local, State, and Federal rules attempt to address the interests of both entities; however, IDEM does not regulate odors or noise. If either of these events occurs, IDEM encourages citizens to pursue resolution at the local level.

The proposed FESOP renewal specifically relates to these citizen's comments in the following ways:

- a) Sections C.1, C.7, D.1.3, D.1.4, and D.1.8 through D.1.14 specifically address the operational requirements for Dragon/ESP-Midwest, Ltd. to limit and control particulate matter such as air-borne dirt and powder.
- b) Sections C.2, C.6, D.1.1, D.1.5, D.1.7 and D.1.8 specifically address the operational requirements for Dragon/ESP-Midwest, Ltd. to limit and control volatile organic compounds (VOC) and hazardous air pollutants (HAP) from sources such as coatings, adhesives, dilution solvents and clean-up solvents.
- c) Section C.3 and D.1.10 specifically address the operational requirements for Dragon/ESP-Midwest, Ltd. to limit opacity. There are no Local, State, or Federal rules relative to Federally Enforceable State Operating Permits which address condensed water vapor emissions (e.g. steam).
- d) There are no Local, State, or Federal rules relative to Federally Enforceable State Operating Permits which address odors.

Changes to the permit were made to include the operator training requirements, record keeping, and changes to the Table of Contents. Those additions are as follows:

#### TABLE OF CONTENTS

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

...

#### **D.1.13 Operator Training Requirements**

- Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]  
D.1.13 14 Record Keeping Requirements  
D.1.14 15 Reporting Requirements

## D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Compliance Monitoring Requirements

#### D.1.8 Particulate Control [326 IAC 2-8-5(a)(4)][**326 IAC 2-8-13(c)(7)**]

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- ~~(a) In order to comply with Condition D.1.3, the dry filters, identified as CE-1 & CE-3, for particulate control, shall be in operation and control emissions from the paint room (EU-01) at all times when EU-01 is in operation.~~
- ~~(b) In order to comply with Condition D.1.4, the cartridge dust collector, identified as CE-2, for particulate control, shall be in operation and control emissions from the grit blast booth (EU-02) at all times when EU-02 is in operation.~~
- (a) In order to comply with Condition D.1.3, and pursuant to 326 IAC 2-8-13(c)(7), the permittee shall:**
- (1) Operate the filter systems, identified as CE-1 & CE-3, for particulate control and to control emissions from the paint room (EU-01) at all times when the paint room is in operation and for an additional thirty (30) minutes after each painting job has ceased.**
  - (2) Replace paint booth filters once per week during full production or, during less than full production, whenever the filters become clogged.**
  - (3) Verify the door to the paint booth is closed at all times when the exhaust fans from either paint booth inside EU-01 are in operation.**
- (b) In order to comply with Condition D.1.4, the permittee shall:**
- (1) Operate the cartridge dust collector, identified as CE-2, for particulate control and to control emissions from the grit blast booth (EU-02) at all times when the booth is in operation.**
  - (2) Verify the door to the grit blast booth (EU-02) is closed at all times when the booth is in operation.**

#### D.1.13 Operator Training Requirements

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- (a) The Permittee shall implement an operator-training program.**
- (1) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of this permit if training was not completed within the last twelve (12) months. All new operators shall be trained within thirty (30) days of hiring or transfer.**
  - (2) Training shall include proper filter alignment, filter inspection and**

**maintenance, and trouble shooting practices. The training program shall be written and include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.**

**(3) All operators shall be given refresher training annually.**

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

**D.1.13 14** Record Keeping Requirements

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...

- (b) To document compliance with Condition D.1.8(a)(4), the Permittee shall maintain a log of filter replacements in CE-1 & CE-3.**
- ~~(b)~~ **c** To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections of the filters CE-1 & CE-3.
- ~~(c)~~ **d** To document compliance with Condition D.1.10, the Permittee shall maintain daily records of visible emission notations of the grit blast booth (EU-02) stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).
- ~~(d)~~ **e** To document compliance with Condition D.1.11, the Permittee shall maintain daily records of the pressure drop across the cartridge filter (CE-2) controlling the grit blast booth (EU-02), during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).
- (f) To document compliance with Condition D.1.13, the Permittee shall maintain a copy of the operator-training program and training records.**
- ~~(f)~~ **g** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.1.16 15** Reporting Requirements

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

- (a) In May of 2009, the source removed the gasoline fuel transfer and dispensing operation, consisting of one 250 gallon tank, identified as T-2. As a result, the requirements of NESHAP 40 CFR 63, Subpart CCCCCC are no longer applicable to this source and all instances of this NESHAP and of this emission unit were removed from the permit. The changes are as follows:
  - (1) The emission unit description was removed and the remaining units in the list were

renumbered.

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

...

~~(e) A gasoline fuel transfer and dispensing operation, constructed in 2003, consisting of one (1) tank, identified as T-2, having a maximum storage capacity of two hundred fifty (250) gallons, and dispensing less than or equal to two hundred twenty five (225) gallons per month.~~

- ~~(f) (e)~~
- ~~(g) (f)~~
- ~~(h) (g)~~
- ~~(i) (h)~~
- ~~(j) (i)~~

(2) Section E.1 was removed from the Table of Contents as was the reference to Attachment A.

~~E.1. EMISSIONS UNIT OPERATION CONDITIONS .....29~~

~~National Emission Standards for Hazardous Air Pollutants Requirements [326 IAC 2-7-5(1)]~~

- ~~E.1.1 General Provisions for Gasoline Dispensing Facilities [40 CFR 63, Subpart A]~~
- ~~E.1.2 NESHAP Subpart CCCCCC Requirements [40 CFR 63, Subpart CCCCCC]~~
- ~~E.1.3 One-Time Deadlines Relating to Gasoline Dispensing Facilities [40 CFR 63, Subpart CCCCCC]~~

...

~~Attachment A NESHAP : 40 CFR 63, Subpart CCCCCC : Gasoline Dispensing Facilities~~

(3) All of Section E.1, which described the requirements for Subpart CCCCCC, was removed from the permit.

**SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

~~(e) A gasoline fuel transfer and dispensing operation, constructed in 2003, consisting of one (1) tank, identified as T-2, having a maximum storage capacity of two hundred fifty (250) gallons, and dispensing less than or equal to two hundred twenty five (225) gallons per month.~~

~~Under NESHAP 40 CFR 63 Subpart CCCCCC, the gasoline storage tank, identified as T2, is considered an affected source as part of an existing gasoline dispensing facility (GDF).~~

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

**National Emission Standards for Hazardous Air Pollutants Requirements [326 IAC 2-7-5(1)]**

~~E.1.1 General Provisions Relating to NESHAP Subpart CCCCCC (National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities) [40 CFR Part 63, Subpart A]~~

~~(a) Pursuant to 40 CFR 63.11130, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A General Provisions, as specified in Table 3 of 40 CFR Part 63, Subpart CCCCCC in accordance with schedule in 40 CFR 63 Subpart CCCCCC~~

~~(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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~~

~~E.1.2 NESHAP Subpart CCCCCC Requirements [40 CFR 63.11110, Subpart CCCCCC]~~

~~Pursuant to 40 CFR 63, Subpart CCCCCC, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart CCCCCC (included as Attachment A), beginning on January 10, 2011, as follows:~~

~~The existing affected sources associated with the owner or operator of a gasoline dispensing facilities (GDF) that is an area source of hazardous air pollutant (HAP) emissions is subject to the following sections of 40 CFR Part 63, Subpart CCCCCC.~~

~~The units subject to this rule include the following:~~

~~One (1) gasoline storage tank, identified as T-2,  
The pressure/vacuum vents on the gasoline storage tank T-2,  
The equipment necessary to unload product from cargo tanks into the storage tank T-2.~~

~~Applicable portions of the NESHAP are the following:~~

~~40 CFR 63.11110  
40 CFR 63.11111(a)(b)(c)(f)  
40 CFR 63.11112(a)(d)  
40 CFR 63.11113(b)(c)  
40 CFR 63.11116  
40 CFR 63.11125  
40 CFR 63.11130  
40 CFR 63.11131  
40 CFR 63.11132  
Applicable portions of Table 3 of 40 CFR 63, Subpart CCCCCC~~

~~E.1.3 One-Time Deadlines Relating to Gasoline Dispensing Facilities Notifications [40 CFR Part 63, Subpart CCCCCC]~~

~~The Permittee shall comply with the following notification requirements by the dates listed:~~

<b>Requirement</b>	<b>Rule Cite</b>	<b>Affected Facility</b>	<b>Deadline</b>
<del>Notification of Compliance Status</del>	<del>40 CFR 63.11113 40 CFR 63.11124</del>	<del>Gasoline Storage Tank (T2)</del>	<del>January 10, 2011</del>

(b) Additional information was submitted by the source documenting the use of 3/16 and 1/4 inch steel sheet which confirms the SIC code of 3444 for this source instead of 3443. Therefore, according to guidance released by the EPA listing the applicable SIC codes, NESHAP 40 CFR 63, Subpart XXXXXX does not apply to the operations performed at this source. The changes to the permit are as follows:

(1) Section E.2 was removed from the Table of Contents as was the reference to Attachment B.

## E.2. EMISSIONS UNIT OPERATION CONDITIONS

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### ~~National Emission Standards for Hazardous Air Pollutants Requirements [326 IAC 2-7-5(1)]~~

~~E.1.1 General Provisions for Metal Fabrication or Finishing Area Sources [40 CFR 63, Subpart A]~~

~~E.1.2 NESHAP Subpart XXXXXX Requirements [40 CFR 63, Subpart XXXXXX]~~

~~E.1.3 One Time Deadlines Relating to Metal Fabrication or Finishing Area Sources  
[40 CFR 63, Subpart XXXXXX]~~

### ~~Attachment B - NESHAP : 40 CFR 63, Subpart XXXXXX :~~

#### ~~Area Source Standards for Nine Metal Fabrication and Finishing Source Categories~~

- (2) The emission unit descriptions were revised in Sections A.2, A.3, and D.1 by removing the reference to XXXXXX applicability.

### 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) paint room, identified as EU-01, constructed in 2004, consisting of two (2) paint booths, each equipped with one (1) airless spray applicator, with a combined maximum capacity to paint 0.625 metal fractionation tanks or 1.250 metal containers per hour, using dry filters (CE-1, CE-3) for particulate control, and exhausting to Stacks S-1 and S-3, respectively.

~~Under NESHAP 40 CFR 63 Subpart XXXXXX, the paint room, identified as EU-01, is considered a spray painting affected source as part of an existing metal fabricating facility.~~

- (b) One (1) grit blast booth, identified as EU-02, constructed in 2004, with a maximum capacity to clean 3,320 pounds of steel per hour, equipped with a cartridge dust collector, identified as CE-2, for particulate control, and exhausting to Stack S-2.

~~Under NESHAP 40 CFR 63 Subpart XXXXXX, the grit blast booth, identified as EU-02, is considered a dry abrasive blasting affected source as part of an existing metal fabricating facility.~~

### 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:

- (c) One (1) welding, cutting and assembly process, constructed in 2004, with a maximum capacity of 16,000 pounds of steel per hour, exhausting to general ventilation, and consisting of the following equipment:

- (1) Fifty-five (55) Metal Inert Gas (MIG) welding stations, identified as W1-W55, each with a maximum capacity to use three (3.0) pounds of wire per station per hour.

~~Under NESHAP 40 CFR 63 Subpart XXXXXX, the fifty five (55) MIG welders, identified as W1 - W55, are considered a welding affected source as part of an existing metal fabricating facility.~~

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) paint room, identified as EU-01, constructed in 2004, consisting of two (2) paint booths, each equipped with one (1) airless spray applicator, with a combined maximum capacity to paint 0.625 metal fractionation tanks or 1.250 metal containers per hour, using dry filters (CE-1 & CE-3) for particulate control, and exhausting to Stacks S-1 and S-3, respectively.

~~Under NESHAP 40 CFR 63 Subpart XXXXXX, the paint room, identified as EU-01, is considered a spray painting affected source as part of an existing metal fabricating facility.~~

- (b) One (1) grit blast booth, identified as EU-02, constructed in 2004, with a maximum capacity to clean 3,320 pounds of steel per hour, equipped with a cartridge dust collector, identified as CE-2, for particulate control, and exhausting to Stack S-2.

~~Under NESHAP 40 CFR 63 Subpart XXXXXX, the grit blast booth, identified as EU-02, is considered a dry abrasive blasting affected source as part of an existing metal fabricating facility.~~

- (3) Section E.2, which described the requirements for Subpart XXXXXX, was removed from the permit.

## SECTION E.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- ~~(a) One (1) paint room, identified as EU-01, constructed in 2004, consisting of two (2) paint booths, each equipped with one (1) airless spray applicator, with a combined maximum capacity to paint 0.625 metal fractionation tanks or 1.250 metal containers per hour, using dry filters (CE-1, CE-3) for particulate control, and exhausting to Stacks S-1 and S-3, respectively.~~

~~Under NESHAP 40 CFR 63 Subpart XXXXXX, the paint room, identified as EU-01, is considered a spray painting affected source as part of an existing metal fabricating facility.~~

- ~~(b) One (1) grit blast booth, identified as EU-02, constructed in 2004, with a maximum capacity to clean 3,320 pounds of steel per hour, equipped with a cartridge dust collector, identified as CE-2, for particulate control, and exhausting to Stack S-2.~~

~~Under NESHAP 40 CFR 63 Subpart XXXXXX, the grit blast booth, identified as EU-02, is considered a dry abrasive blasting affected source as part of an existing metal fabricating facility.~~

- ~~(c) One (1) welding, cutting, and assembly process, constructed in 2004, with a maximum capacity of 16,000 pounds of steel per hour, exhausting to general ventilation, and consisting of the following equipment:~~

- ~~(1) Fifty-five (55) Metal Inert Gas (MIG) welding stations, identified as W1-W55, each with a maximum capacity to use three (3.0) pounds of wire per station per hour.~~

~~Under NESHAP 40 CFR 63 Subpart XXXXXX, the fifty-five (55) MIG welders, identified as W1-W55, are considered a welding affected source as part of an existing metal~~

fabricating facility.

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

### **National Emission Standards for Hazardous Air Pollutants Requirements [326 IAC 2-7-5(1)]**

#### **E.2.1 General Provisions Relating to NESHAP Subpart XXXXXX (National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories) [40 CFR Part 63, Subpart A]**

- (a) Pursuant to 40 CFR 63.11514, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, as specified in Table 2 of 40 CFR Part 63, Subpart XXXXXX in accordance with schedule in 40 CFR 63 Subpart XXXXXX
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2254

#### **E.2.2 NESHAP Subpart XXXXXX Requirements [40 CFR 63.11514, Subpart XXXXXX]**

Pursuant to 40 CFR 63, Subpart XXXXXX, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart XXXXXX, beginning on July 25, 2011, as follows:

The new or existing affected sources which own or operate an area source that is primarily engaged in operations in one of the nine source categories listed in Table 1 and which use materials which contain or have the potential to emit metal fabrication or finishing metal hazardous air pollutant (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel. is subject to the following sections of 40 CFR Part 63, Subpart XXXXXX.

The units subject to this rule include the following:

- One (1) paint room, identified as EU-01
- One (1) grit blast booth, identified as EU-02
- Fifty-five (55) MIG welders, identified as W1-W55.

Applicable portions of the NESHAP are the following:

- 63.11514
- 63.11515(a)
- 63.11516(a, d, f)
- 63.11517
- 63.11519
- 63.11521
- 63.11522
- 63.11523

— Applicable portions of Tables 1 & 2 of 40 CFR 63, Subpart XXXXXX

#### **E.2.3 One-Time Deadlines Relating to Area Source Standards for Nine Metal Fabrication and Finishing Source Categories Notifications [40 CFR Part 63, Subpart XXXXXX]**

The Permittee shall comply with the following notification requirements by the dates listed:

Requirement	Rule Cite	Affected Facility	Deadline
Initial Notification	40 CFR 63.11519(a)(1)	One (1) paint room, identified as EU-01 One (1) grit blast booth, identified as EU-02 Fifty five (55) MIG welders, identified as W1-W55	July 25, 2011
Notification of Compliance Status	40 CFR 63.11519(a)(2)	One (1) paint room, identified as EU-01 One (1) grit blast booth, identified as EU-02 Fifty five (55) MIG welders, identified as W1-W55	November 22, 2011
First Annual Certification and Compliance Report	40 CFR 63.11519(b)(2)(i)	One (1) paint room, identified as EU-01 One (1) grit blast booth, identified as EU-02 Fifty five (55) MIG welders, identified as W1-W55	January 31, 2012

- (4) After the above changes, the remaining documents in the permit were renumbered in the Table of Contents.

Certification Form	33 27
Emergency Occurrence Form	34 28
Quarterly Report Form - VOC	36 30
Quarterly Report Form - Individual HAP	37 31
Quarterly Deviation and Compliance Monitoring Report Form	39 32

- (d) Typographical errors in Section D.1 were corrected as follows:

**D.1.5 ~~PM<sub>10</sub>~~, ~~PM<sub>2.5</sub>~~ VOC, and HAP Limits [326 IAC 2-8-4]**

... Compliance with these limits, in conjunction with the limited PTE from all other emission units at this source, shall limit the source wide VOC, ~~PM<sub>10</sub>~~ & ~~PM<sub>2.5</sub>~~ emissions to less than one hundred (100) tons per twelve (12) consecutive month period; the Xylene emissions to less than ten (10) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Operating Permits) and 326 IAC 2-4.1 (Major Sources of HAP) not applicable.

**D.1.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]**

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and **D.1.5** ~~D.1.6(e)~~ 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.

**D.1.8 Particulate Control [326 IAC 2-8-5(a)(4)]**

- (a) In order to comply with Conditions ~~D.1.4~~, ~~D.1.6(a)~~, and ~~D.1.6(b)~~ **D.1.3**, the dry filters, identified as CE-1 & CE-3, for particulate control, shall be in operation and control emissions from the paint room (EU-01) at all times when EU-01 is in operation.
- (b) In order to comply with Condition ~~D.1.7~~ **D.1.4**, the cartridge dust collector, identified as CE-2, for particulate control, shall be in operation and control emissions from the grit blast

booth (EU-02) at all times when EU-02 is in operation.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed FESOP Renewal can be directed to Sandra Carr at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5372 or toll free at 1-800-451-6027 extension 45372.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Dragon/ESP-Midwest, Ltd.</b>
<b>Source Location:</b>	<b>8857 East State Road 14, Akron, Indiana 46910</b>
<b>County:</b>	<b>Fulton</b>
<b>SIC Code:</b>	<b>3444</b>
<b>Permit Renewal No.:</b>	<b>049-27195-00008</b>
<b>Permit Reviewer:</b>	<b>Sandra Carr</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Dragon/ESP-Midwest, Ltd. relating to the operation of a stationary metal fabricating facility.

**History**

On December 1, 2008, Dragon/ESP-Midwest, Ltd. submitted an application to the OAQ requesting to renew its operating permit. Dragon/ESP-Midwest, Ltd. was issued a FESOP on September 1, 2004.

There have been no new emission units added at this source since the issuance of FESOP No. 049-23039-00008 on August 24, 2006.

There have been no emission units removed from this source since the issuance of FESOP No. 049-23039-00008 on August 24, 2006.

**Permitted Emission Units and Pollution Control Equipment**

- (a) One (1) paint room, identified as EU-01, constructed in 2004, consisting of two (2) paint booths, each equipped with one (1) airless spray applicator, with a combined maximum capacity to paint 0.625 metal fractionation tanks or 1.250 metal containers per hour, using dry filters (CE-1, CE-3) for particulate control, and exhausting to Stacks S-1 and S-3, respectively.

Under NESHAP 40 CFR 63 Subpart XXXXXX, the paint room, identified as EU-01, is considered a spray painting affected source as part of an existing metal fabricating facility.

- (b) One (1) grit blast booth, identified as EU-02, constructed in 2004, with a maximum capacity to clean 3,320 pounds of steel per hour, equipped with a cartridge dust collector, identified as CE-2, for particulate control, and exhausting to Stack S-2.

Under NESHAP 40 CFR 63 Subpart XXXXXX, the grit blast booth, identified as EU-02, is considered a dry abrasive blasting affected source as part of an existing metal fabricating facility.

**Insignificant Activities**

- (c) One (1) welding, cutting, and assembly process, constructed in 2004, with a maximum

capacity of 16,000 pounds of steel per hour, exhausting to general ventilation, and consisting of the following equipment:

- (1) Fifty-five (55) Metal Inert Gas (MIG) welding stations, identified as W1-W55, each with a maximum capacity to use three (3.0) pounds of wire per station per hour (1.98 tons/day).

Under NESHAP 40 CFR 63 Subpart XXXXXX, the fifty-five (55) MIG welders, identified as W1 - W55, are considered a welding affected source as part of an existing metal fabricating facility.

- (2) Ten (10) oxyacetylene flame-cutting stations, identified as AFC1 - AFC10, each with a maximum capacity to cut 20.0 inches of 0.25 inch thick metal per minute.
  - (3) One (1) plasma flame-cutting station, identified as PFC1, with a maximum capacity to cut 20.0 inches of 1.00 inch thick metal per minute.
- (d) Propane or liquefied petroleum gas, or butane-fired combustion sources with a maximum heat input equal to or less than six million (6,000,000) British thermal units per hour (MMBtu/hr), consisting of:
- (1) Two (2) space heaters, identified as H-1 and H-2, firing propane gas, with a maximum capacity: 0.1 million British thermal units per hour (MMBtu/hr), each.
  - (2) One (1) space heater, identified as H-3, firing propane gas, with a maximum capacity: 0.3 million British thermal units per hour (MMBtu/hr).
- (e) A gasoline fuel transfer and dispensing operation, constructed in 2003, consisting of one (1) tank, identified as T-2, having a maximum storage capacity of two hundred fifty (250) gallons, and dispensing less than or equal to two hundred twenty-five (225) gallons per month.

Under NESHAP 40 CFR 63 Subpart CCCCCC, the gasoline storage tank, identified as T2, is considered an affected source as part of an existing gasoline dispensing facility (GDF).

- (f) A petroleum fuel, other than gasoline, dispensing facility, having a total maximum storage capacity of seven thousand seven hundred fifty (7,750) gallons; consisting of:
- (1) two (2) diesel storage tanks, identified as T-3 & T-4; T-3 was constructed in 2003, T-4 was constructed in 2006, each has a maximum storage capacity of two hundred fifty (250) gallons, and each dispenses less than or equal to three hundred twenty (320) gallons per month;
  - (2) one (1) kerosene storage tank, constructed in 2001, identified as T-1, having a maximum storage capacity of two hundred fifty (250) gallons, and dispensing less than or equal to five hundred fifteen (515) gallons per winter;
  - (3) seven (7) LPG pressurized storage tanks, identified as LP-1 - LP-7, four (4) tanks were constructed in 1998 & three (3) tanks were constructed in 2001, each having a maximum storage capacity of one (1) thousand gallons.
- (g) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (h) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other

air filtration equipment.

- (i) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (j) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

### Existing Approvals

Since the issuance of the FESOP (049-19280-00008) on September 1, 2004, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. 049-20277 issued on February 22, 2005; and
- (b) Significant Permit Revision No. 049-21673 issued on November 14, 2005, and
- (c) Interim No. 049-21673 issued on June 27, 2006, and
- (d) Significant Permit Revision No. 049-23039 issued on August 24, 2006.

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

The following terms and conditions from previous approvals have been removed from this FESOP Renewal:

- (e) Since manganese is no longer a component of the coatings used in the paint room EU-01, the limit for manganese has been removed from this permit.
- (g) Since the source has instituted the use of No- or Low-HAP coatings, the total HAP emissions are significantly lower than the twenty-five (25) ton threshold. Therefore, since the potential to emit total HAP is less than seventeen (17) tons per year, the total HAP limit has been removed from this permit. Removing this limit from the permit does not relieve the source of responsibility to comply with the less than twenty-five (25) ton total HAP limit specified in 326 IAC 2-4.1.

The following terms and conditions have been added in this FESOP Renewal:

- (h) **Single HAP limit**  
Due to changes by the manufacturer in the composition of the coatings used, the potential to emit xylene is greater than ten (10) tons per year. In order to ensure that xylene emissions do not exceed ten (10) tons per year, the total amount of all xylene compounds used at the paint room (EU-01), including coatings, adhesives, dilution solvents, and cleaning solvents shall be limited to less than nine and nine-tenths (9.9) tons per twelve (12) consecutive month period with compliance determined at the end of each month. This is a new requirement.
- (i) **Particulates**  
On May 8, 2008 the U.S. EPA rule revised the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. Pursuant to the rule revision, until Indiana's 326 IAC 2-2 is revised, IDEM is required to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions. Therefore, for all new permits or permit renewals, requirements for PM<sub>2.5</sub> are added where applicable.

- (j) In order render the requirements of 326 IAC 2-2 not applicable, PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emission limits have been added for the surface coating room EU-01. In conjunction with these emission limits, Particulate Emission Determination requirements were also added.
- (k) Application of 40 CFR 63.11110 Subpart CCCCCC  
A new area source NESHAP for gasoline dispensing facilities (GDF) was published on January 10, 2008.
  - (1) The gasoline storage tank, identified as T-2, is considered an affected source as part of an existing gasoline dispensing facility.
- (l) Application of 40 CFR 63.11514 Subpart XXXXXX  
A new area source NESHAP for Nine Metal Fabrication and Finishing Source Categories was published on July 23, 2008.
  - (1) The paint room, identified as EU-01, is considered a spray painting affected source as part of an existing metal fabricating facility
  - (2) The grit blast booth, identified as EU-02, is considered a dry abrasive blasting affected source as part of an existing metal fabricating facility.
  - (3) The fifty-five (55) MIG welders, identified as W1 - W55, are considered a welding affected source as part of an existing metal fabricating facility..

**Enforcement Issue**

There are no enforcement actions pending.

**Emission Calculations**

See Appendix A of this document for detailed emission calculations.

**County Attainment Status**

The source is located in Fulton County

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.

<sup>1</sup>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<sub>2.5</sub>.

*(Air Pollution Control Board; 326 IAC 1-4-26; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA)*

- (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, and 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 (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Fulton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b)  $PM_{2.5}$   
Fulton County has been classified as attainment for  $PM_{2.5}$ . On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for  $PM_{2.5}$  emissions, and the effective date of these rules was July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate  $PM_{10}$  emissions as a surrogate for  $PM_{2.5}$  emissions until 326 IAC 2-2 is revised.
- (c) Other Criteria Pollutants  
Fulton County has been classified as attainment or unclassifiable in Indiana for  $PM_{10}$ ,  $SO_2$ , VOC, NOx, and CO. 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 PM, VOC, and  $PM_{10}/PM_{2.5}$  is equal to or greater than one hundred (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 PM, VOC, and  $PM_{10}/PM_{2.5}$  emissions to less than Title V levels, therefore the source will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are still less than one hundred (100) tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any individual HAP is equal to or

greater than ten (10) tons per year. However, the source has agreed to limit xylene emissions to below Title V limits. Therefore, the source will be issued a FESOP Renewal.

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

**Potential to Emit After Issuance**

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM <sub>10</sub> <sup>*</sup>	PM <sub>2.5</sub> <sup>**</sup>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAP	Individual HAP
Paint Room (EU-1)	32.57 <sup>(3)</sup>	32.57 <sup>(3)</sup>	32.57 <sup>(3)</sup>	negl.	negl.	<95.0 <sup>(1)</sup>	negl.	21.88 (worst case)	<9.9 <sup>(1)</sup> (Xylene)
Shot blasting (EU-2)	49.49 <sup>(2)</sup>	42.46 <sup>(2)</sup>	42.46 <sup>(2)</sup>	negl.	negl.	negl.	negl.	negl.	negl.
Welding/cutting (EU-3)	3.45	3.45	3.45	negl.	negl.	negl.	negl.	1.24	0.58 (Chromium <sup>+6</sup> )
Combustion	0.005	0.005	0.005	0.001	0.30	0.002	0.18	negl.	negl.
<b>PTE TOTALS</b>	<b>85.52</b>	<b>78.49</b>	<b>78.49</b>	<b>0.001</b>	<b>0.30</b>	<b>&lt;95.00</b>	<b>0.18</b>	<b>23.12</b>	<b>&lt;10</b>
TITLE V MAJOR SOURCE THRESHOLDS	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM <sub>10</sub> ), not particulate matter (PM), is considered as a "regulated air pollutant". ** On May 8, 2008, the U.S. EPA directed that PM <sub>10</sub> emissions be used as a surrogate for PM <sub>2.5</sub> emissions until 326 IAC 2.2 is revised.									

- (1) Based on 326 IAC 2-8-4 (FESOP) limitations.  
 (2) PM, PM<sub>10</sub> and PM<sub>2.5</sub> values shown are uncontrolled. Controlled emissions are lower. (See detailed calculations on page 3 of Appendix A.)  
 (3) Based on 90% emission control reported by source.

- (a) **PSD Minor Source**  
 This existing source is still not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit PM, PM<sub>10</sub> and PM<sub>2.5</sub> is less than two hundred fifty (250) tons per year, each, and the potential to emit all other attainment regulated pollutants are still less than two hundred fifty (250) tons per year, and this source is still not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements still do not apply.

- (1) The calculated limited PM of the entire source is less than the 95% of the major source threshold; therefore a PM emission limit for the surface coating booths in the paint room EU-01 shall not be included in the permit.

Emission Unit	PM PTE	95% of the Major Source Threshold	Specify Limits (Yes or No)
Surface Coating Booth EU-01	32.57	-	<b>NO</b>
All Other Units	52.95	-	
Total	85.52	237.5	

- (2) The calculated limited PM<sub>10</sub> of the entire source is less than the 95% of the major source threshold (95); therefore a PM<sub>10</sub> emission limit for the surface coating booths in the paint room EU-01 shall not be included in the permit.

Emission Unit	PM <sub>10</sub> PTE	95% of the Major Source Threshold	Specify Limits (Yes or No)
Surface Coating Booth EU-01	32.57	-	<b>NO</b>
Other Units	42.46	-	
Total	78.49	95.0	

- (3) The calculated limited PM<sub>2.5</sub> of the entire source is less than the 95% of the major source threshold (237.5); therefore a PM<sub>2.5</sub> emission limit for the surface coating booths in the paint room EU-01 shall not be included in the permit.

Emission Unit	PM <sub>2.5</sub> PTE	95% of the Major Source Threshold	Specify Limits (Yes or No)
Surface Coating Booth EU-01	32.57	-	<b>NO</b>
Other Units	42.46	-	
Total	78.49	237.5	

Therefore, no limits will be added as a result of the determinations shown in 1-3 above.

- (b) Fugitive Emissions  
 Since this type of operation is still not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are still not counted toward the determination of PSD and Emission Offset applicability.

**Air Quality Impacts from Minor Sources**

Modeling Overview

Pursuant to 326 IAC 2-1.1-5, IDEM, OAQ, has conducted a modeling analysis of the Limited Potential to Emit (PTE) criteria pollutants from this proposed source to estimate whether the Limited PTE of criteria pollutants will cause or contribute to a violation of any National Ambient Air Quality Standard (NAAQS).

Modeling Results – Criteria Pollutants

The modeling results indicate that the Limited PTE of criteria pollutants from this source will not exceed the National Ambient Air Quality Standards (NAAQS).

**Federal Rule Applicability**

- (a) Provisions of the New Source Performance Standard (326 IAC 12 and 40 CFR Part 60.110, Subpart K) “Standards of Performance for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification Commenced after June 11, 1973 and prior to May 19, 1978” applies to storage vessels with storage capacity

greater than 40,000 gallons. This subpart still does not apply to this source because the four (4) volatile organic liquid storage vessels, identified as T1, T2, T-3 & T-4, were constructed after 1978 and have storage capacities of less than 40,000 gallons.

- (b) Provisions of the New Source Performance Standard (326 IAC 12 and 40 CFR Part 60.110, Subpart Ka) "Standards of Performance for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction, or Modification Commenced after May 18, 1978 and prior to July 23, 1984" apply to storage vessels with storage capacity greater than 40,000 gallons. This subpart still does not apply to the four (4) volatile organic liquid storage vessels, identified as T1, T2, T-3 & T-4, because they were constructed after 1984 and have storage capacities of less than 40,000 gallons.
- (c) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, 40 CFR 60.110b, Subpart Kb (326 IAC 12), are not included in the permit, since the four (4) volatile organic liquid storage vessels, identified as T1, T2, T-3 & T-4, each have a maximum capacity of two hundred fifty (250) gallons, which is less than the 19,813 gallon minimum specified in the rule.

There are no other New Source Performance Standards (NSPS)(40 CFR Part 60) included in the permit.

- (d) Provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63.2330, Subpart EEEE) "Organic Liquids Distribution (Non-gasoline)" apply to organic hazardous air pollutants (HAP) emitted from organic liquids distribution (non-gasoline) operations at major sources of HAP emissions. Dragon/ESP-Midwest, Ltd. is still not subject to this rule because it is not a major source of HAP as defined in 40 CFR 63.2.
- (e) This source is still not subject to the requirements of 40 CFR 63, Subpart MMMM - National Emission Standards for Hazardous Air Pollutants: Miscellaneous Metal Parts and Products: This standard applies to major sources of hazardous air pollutants (HAP), at which coating of miscellaneous metal parts and products takes place. Although this source coats metal parts using airless spray guns, the source is not subject to this standard because the source has agreed to continue to use "no HAP" coatings to render its potential to emit below major source thresholds for any individual HAP or any combination of HAP.
- (f) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Category, 40 CFR 63, Subpart CCCCCC - (Gasoline Dispensing Facilities (GDF)) apply to owners or operators of gasoline dispensing facilities (GDF). This subpart establishes emission limitations and management practices for hazardous air pollutants (HAP) emitted from the loading of gasoline storage tanks at GDF. The subpart also establishes requirements to demonstrate compliance with emission limitations and management practices. [See Attachment A for a copy of 40 CFR Part 63.11110, Subpart CCCCCC.]

The affected source to which this subpart applies is each gasoline dispensing facility (GDF) that is located at an area source of hazardous air pollutants (HAP). The affected source includes each gasoline cargo tank during the delivery of product to a GDF and also includes each storage tank.

At this source, the existing affected emission source to which this subpart applies is the gasoline storage tank, identified as T2, the pressure/vacuum vents on the gasoline

storage tank T-2, and the equipment necessary to unload product from cargo tanks into the storage tank T-2 at this GDF. (The equipment used for the refueling of motor vehicles is not covered by this subpart.)

Therefore, the provisions of 40 CFR Part 63, subpart CCCCCC are applicable to this source and will be included in this permit.

The units subject to this rule include the following:

One (1) gasoline storage tank, identified as T-2

Applicable portions of the NESHAP are the following:

40 CFR 63. 11110  
40 CFR 63. 11111(a)(b)(e)(f)  
40 CFR 63. 11112(a)(d)  
40 CFR 63. 11113(b)(c)  
40 CFR 63. 11116  
40 CFR 63. 11125  
40 CFR 63. 11130  
40 CFR 63. 11131  
40 CFR 63. 11132  
Table 3

Nonapplicable portions of the NESHAP will not be included in the permit.

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the gasoline storage tank T-2, the pressure/vacuum vents on the gasoline storage tank T-2, and the equipment necessary to unload product from cargo tanks into the storage tank T-2 at this GDF except as otherwise specified in 40 CFR Part 63, Subpart CCCCCC.

- (g) This source is not subject to the requirements of 40 CFR 63, Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal and Plastic Parts. Although this standard applies to area sources of hazardous air pollutants (HAP) which coat metal parts using spray guns, the source is subject to 40 CFR Part 63.11514, Subpart XXXXXX and, pursuant to 63.11514 (b)(4) is, therefore, not subject to the miscellaneous surface coating provisions of subpart HHHHHH
- (h) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart XXXXXX (Area Source Standards for Nine Metal Fabrication and Finishing Source Categories) apply to owners or operators of new or existing area sources which are primarily engaged in operations in one of the nine source categories and use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP). Pursuant 40 CFR Part 63.11522, *metal fabricating and finishing operations* is defined as: dry abrasive blasting, dry grinding or polishing, machining, spray painting, welding and/or the use of *metal fabrication or finishing HAP (MFHAP)*. MFHAP are materials that contain cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), or nickel (Ni) in amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal). [See Attachment B for a copy of 40 CFR Part 63.11514, Subpart XXXXXX.]

A dry abrasive blasting affected source is the collection of all equipment and activities necessary to perform dry abrasive blasting operations which use materials that contain MFHAP or that have the potential to emit MFHAP.

A welding affected source is defined as a collection of all equipment and activities necessary to perform welding operations which use materials that contain MFHAP, as defined in §63.11522.

A spray painting affected source is the collection of all equipment and activities necessary to perform spray-applied painting operations using paints which contain MFHAP. A spray painting affected source includes all equipment used to apply cleaning materials to a substrate to prepare it for paint application (surface preparation) or to remove dried paint; to apply a paint to a substrate (paint application) and to dry or cure the paint after application; or to clean paint operation equipment (equipment cleaning).

Pursuant to 63.11514(c), an affected source is 'existing' if the owner or operator commenced construction or reconstruction of the affected source before April 3, 2008.

This source is primarily engaged in metal fabrication and coating under the SIC code 3444. This existing source uses dry abrasive blasting to remove rust from carbon steel prior to welding. The source then welds pieces of steel together to fabricate fractionation tanks and other large metal containers. The finished product is spray painted to inhibit rust.

The provisions of 40 CFR 63, subpart XXXXXX are applicable to the dry abrasive blasting operations performed at this source because during dry abrasive blasting of the surface of the steel, MFHAP components contained in the steel may be emitted. Therefore, the dry abrasive blasting operations will be included as an as affected source in this permit.

The MFHAP from the welding operations (Cr, Ni, Pb, & Mn) are released from the wire and the steel when it is melted. Therefore, the fifty-five (55) MIG welders, identified as W1-W55, at this source are included as affected sources.

The source spray paints metal parts and uses materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP) so the two (2) spray booths inside the paint room, EU-01, will be affected sources under this standard.

Therefore, the provisions of 40 CFR 63, subpart XXXXXX are applicable to the abrasive blasting, welding, and spray painting operations performed at this source and will be included in this permit.

The units subject to this rule include the following:

- One (1) spray painting room, identified as EU-01,
- One (1) grit blast booth, identified as EU-02,
- Fifty-five (55) MIG welders, identified as W1 - W55.

Applicable portions of the NESHAP are the following:

- 63.11514
- 63.11515(a)
- 63.11516(a, d, f)
- 63.11517

63.11519  
63.11521  
63.11522  
63.11523  
Table 1, Table 2

- (i) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.
- (j) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is still less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

<b>State Rule Applicability - Entire Source</b>
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326 IAC 2-2 (Prevention of Significant Deterioration(PSD))  
PSD applicability is discussed under the "Potential to Emit After Issuance" Section above.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The requirements of 326 IAC 2-4.1 apply to sites which are major sources of HAP emissions. This source is still not subject to 326 IAC 2-4.1 because the source has agreed to continue to use "No HAP" coatings to limit the potential to emit any single HAP to less than ten (10) tons per twelve (12) consecutive month period, and any combination of HAP to less than twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the source is still not subject to the requirements of 326 IAC 2-4.1. See the "Potential to Emit After Issuance" Section above.

326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is still not subject to part (a) of this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year. However, pursuant to 326 IAC 2-6-1(b), all sources permitted by the department are subject to section 5 of this rule which states that the department may request emissions and emission-related information about any regulated air pollutant as defined at 326 IAC 2-7-1(31) from any permitted source when needed for air quality planning, air quality modeling, or state implementation plan development.

326 IAC 2-7-5(13) (Preventive Maintenance Plan)  
A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

326 IAC 2-8-4 (FESOP)  
Pursuant to this rule, the amount of PM<sub>10</sub>/PM<sub>2.5</sub> and VOC shall continue to be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall continue to be limited to less than ten (10) tons per year and the combination of all HAP shall continue to be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7 (Part 70 Operating Permits), do not apply.

- (a) The use of VOC at the paint room (EU-01), including coatings, adhesives, dilution solvents, and cleaning solvents shall be limited to less than ninety-five (95.0) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

This limit is required to continue to limit the potential to emit VOC from the entire source to less than one hundred (100) tons per year. Compliance with this limit continues to make 326 IAC 2-7 (Part 70) not applicable.

- (b) In order to ensure that emissions of any single HAP do not exceed ten (10) tons per year, the total amount of all xylene compounds used at the paint room (EU-01), including coatings, adhesives, dilution solvents, and cleaning solvents shall be limited to less than nine and nine-tenths (9.9) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This is a new requirement .

This limit is required to continue to limit the potential to emit of any single HAP from the entire source to less than ten (10) tons per year.. Compliance with this limit continues to make 326 IAC 2-4.1 not applicable.

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

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

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

<b>State Rule Applicability – Individual Facilities</b>
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#### 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes)

Particulate from the paint room, identified as EU-01 shall continue to be controlled by a dry particulate filter, and the Permittee shall continue to operate the control devices CE-1 & CE-3 in accordance with manufacturer's specifications.

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

- (a) Pursuant to 326 IAC 6-3-1(b)(10), the oxyacetylene cutting operations at this source are still exempt from the requirements of this rule because less than 3,400 inches per hour of stock, one (1) inch thickness or less, is cut.
- (b) Pursuant to 326 IAC 6-3, the particulate from the 55 MIG welders, identified as W1-W55, are each exempt from the requirements of 326 IAC 6-3, because they each have a potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.
- (c) Pursuant to 326 IAC 6-3, the particulate from the one (1) grit blast booth, identified as EU-02 shall continue not to exceed 5.76 pounds per hour when operating at a process weight rate of 3,320 pounds per hour (1.66 tons per hour).

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

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

In order to comply with this limit, the cartridge dust collector, CE-2, shall continue to be in operation at all times the grit blast booth EU-02 is in operation.

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

The surface coating operations at this source, identified as EU-01, perform the coating of metal parts under the SIC classification code 3444, which makes this source subject to this rule under 326 IAC 8-2-9(a)(5).

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicators in the paint room, identified as EU-01, shall continue to be limited to three and five-tenths (3.5) pounds of VOC per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall continue to be directed into containers. Such containers shall continue to be closed as soon as such solvent spraying is complete, and the waste solvent shall continue to be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booths can still comply with this requirement. See Appendix A for detailed calculations.

<b>State Rule Applicability - Petroleum Storage &amp; Distribution</b>
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The following state rules are evaluated for applicability to the petroleum distribution operations at this source:

**326 IAC 8-4-6 (Gasoline Dispensing Facilities)**

- (a) Pursuant to 326 IAC 8-4-1(f), the Gasoline Storage Tank, T-2, is still not subject to this rule because it is located in Fulton County and it has a throughput of less than ten thousand (10,000) gallons of gasoline per month.
- (b) Pursuant to 326 IAC 8-4-6(a)(8), the Diesel Storage tanks, T-3 & T-4, and the kerosene tank, T1, are still not subject to this rule because diesel & kerosene are not considered to be motor vehicle fuels.

**326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels)**

Pursuant to 326 IAC 8-9-1(b), stationary vessels with capacities less than thirty-nine thousand (39,000) gallons are only subject to the reporting and record keeping requirements of 326 IAC 8-9-1. The volatile organic liquid storage vessels, identified as one (1) gasoline tank (T-2), two (2) diesel tanks (T-3 & T-4), and one (1) kerosene tank (T-1), each have storage capacities less than one thousand (1000) gallons and are therefore only subject to provisions 326 IAC 8-9-6(b).

- (a) Pursuant to 326 IAC 8-9-6(b), the owner or operator of the volatile organic liquid storage vessels, identified as T1, T2, T3 and T4, shall keep all records required by this section for three (3) years unless specified otherwise. Records required by subsection (b) shall be maintained for the life of the vessel.
- (b) Pursuant to 326 IAC 8-9-6(b), the owner or operator of the volatile organic liquid storage vessels, identified as T1, T2, T3 and T4, which are subject to this rule, shall maintain a record and submit to the department a report containing the following information for each vessel:
  - (1) The vessel identification number,
  - (2) The vessel dimensions,

- (3) The vessel capacity.

There are no other 326 IAC 8 Rules that are applicable to the operations performed at this source.

### Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

### Testing Requirements

- (a) Compliance testing is still not required for the surface coating operations in the paint room (EU-01), since compliance with the VOC content requirements for the coatings can be determined by evaluating MSDS (or "as supplied" and "as applied" VOC data sheets) and keeping records of the amount of coatings, any applicable calculations, and VOC applied.

All emission calculations were based on AP-42 emission factors and/or the MSDS submitted by the source. Therefore, no testing is required.

The compliance monitoring requirements applicable to this source are shown in the table below:

Control	Parameter	Frequency	Range	Excursions and Exceedances
CE-1 (dry filter)	Filter Integrity	Daily	Normal-Abnormal	Response Steps
	Overspray	Weekly	Normal-Abnormal	
CE-2 (cartridge dust collector)	Water Pressure Drop	Daily	5 to 8 inches	Response Steps
	Visible Emissions	Weekly	Normal-Abnormal	
CE-3 (dry filter)	Filter Integrity	Daily	Normal-Abnormal	Response Steps
	Visible Emissions	Weekly	Normal-Abnormal	

### 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 December 1, 2008. Additional information was received on March 16, 2009.

<b>Conclusion</b>
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The operation of this metal fabricating source shall be subject to the conditions of the attached FESOP Renewal No. 049-27195-00008.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Sandra Carr at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5372 or toll free at 1-800-451-6027 extension 45372.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

**Summary**

**Company Name:** Dragon / ESP-Midwest, Ltd.  
**Address City IN Zip:** 8857 East State Road 14, Akron, Indiana 46910  
**Permit Number:** F049-27195-00008  
**Permit Reviewer:** Sandra Carr  
**Application Date:** December 1, 2008

<b>Uncontrolled</b>	Surface Coating (EU-1)	Abrasive Blasting (EU-2)	Welding & Cutting	Combustion (H1 - H3)	<b>TOTALS</b>
PM	325.73	49.49	3.45	0.005	<b>378.68</b>
PM <sub>10</sub>	325.73	42.56	3.45	0.005	<b>371.75</b>
PM <sub>2.5</sub>	325.73	42.56	3.45	0.005	<b>371.75</b>
SO <sub>2</sub>	negl.	negl.	negl.	0.001	<b>0.00</b>
NOx	negl.	negl.	negl.	0.30	<b>0.30</b>
VOC	185.39	negl.	negl.	0.002	<b>185.39</b>
CO	negl.	negl.	negl.	0.17	<b>0.17</b>
Xylene	11.51	negl.	negl.	negl.	<b>11.51</b>
Ethylbenzene	3.84	negl.	negl.	negl.	<b>3.84</b>
NiSb	6.53	negl.	negl.	negl.	<b>6.53</b>
Cumene	0.10	negl.	negl.	negl.	<b>0.10</b>
Other Organic HAP	0.31	negl.	negl.	negl.	<b>0.31</b>
Cobalt	negl.	negl.	0.34	negl.	<b>0.34</b>
Chromium	negl.	negl.	0.58	negl.	<b>0.58</b>
Manganese	negl.	negl.	0.19	negl.	<b>0.19</b>
Nickel	negl.	negl.	0.00	negl.	<b>0.00</b>
Lead	negl.	negl.	0.12	negl.	<b>0.12</b>
Total HAP	21.88	negl.	1.24	negl.	<b>23.12</b>

Based on 8,760 hours per year.

<b>Controlled</b>	Surface Coating (EU-1)	Abrasive Blasting (EU-2)	Welding & Cutting	Combustion (H1 - H3)	<b>TOTALS</b>
PM	32.57	10.29	3.45	0.005	<b>46.33</b>
PM <sub>10</sub>	32.57	8.85	3.45	0.005	<b>44.88</b>
PM <sub>2.5</sub>	32.57	8.85	3.45	0.005	<b>44.88</b>
SO <sub>2</sub>	negl.	negl.	negl.	0.001	<b>0.00</b>
NOx	negl.	negl.	negl.	0.303	<b>0.30</b>
VOC	<95	negl.	negl.	0.002	<b>&lt;95</b>
CO	negl.	negl.	negl.	0.175	<b>0.17</b>
Xylene	<9.9	negl.	negl.	negl.	<b>&lt;9.9</b>
Ethylbenzene	3.84	negl.	negl.	negl.	<b>3.84</b>
NiSb	0.65	negl.	negl.	negl.	<b>0.65</b>
Cumene	0.10	negl.	negl.	negl.	<b>0.10</b>
Other Organic HAP	0.31	negl.	negl.	negl.	<b>0.31</b>
Cobalt	negl.	negl.	0.34	negl.	<b>0.34</b>
Chromium	negl.	negl.	0.58	negl.	<b>0.58</b>
Manganese	negl.	negl.	0.19	negl.	<b>0.19</b>
Nickel	negl.	negl.	0.00	negl.	<b>0.00</b>
Lead	negl.	negl.	0.12	negl.	<b>0.12</b>
Total HAP	14.80	negl.	1.24	negl.	<b>16.04</b>

Appendix A: Emission Calculations

Abrasive Blasting - Confined

Company Name: Dragon / ESP-Midwest, Ltd.  
 Address City IN Zip: 8857 East State Road 14, Akron, Indiana 46910  
 Permit Number: F049-27195-00008  
 Permit Reviewer: Sandra Carr  
 Application Date: December 1, 2008

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM <sub>10</sub> / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft<sup>3</sup>)

Abrasive	Density (lb/ft <sup>3</sup> )
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)

FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =

D = Density of abrasive (lb/ft<sup>3</sup>) From Table 2 =

D1 = Density of sand (lb/ft<sup>3</sup>) =

ID = Actual nozzle internal diameter (in) =

ID1 = Nozzle internal diameter (in) from Table 3 =

309
487
99
0.2756
0.25

Flow Rate (FR) (lb/hr) = 1847.271 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =

FR = Flow Rate (lb/hr) =

w = fraction of time of wet blasting =

N = number of nozzles =

0.004
1847.271
0
1

Uncontrolled Emissions =	11.30	lb PM/hr	***
	9.72	lb PM <sub>10</sub> /hr	
	49.49	tons PM/yr	
	42.56	tons PM <sub>10</sub> /yr	

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs

Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)<sup>2</sup> x (D/D1)

E = EF x FR x (1-w/200) x N

w should be entered in as a whole number (if w is 50%, enter 50)

\*\*\*The uncontrolled PM Emission rate, 11.30 lb/hr, is from September 16, 2008 stack test results.

Controlled Emissions =	2.35	lb PM/hr
	2.02	lb PM <sub>10</sub> /hr
	10.29	tons PM/yr
	8.85	tons PM <sub>10</sub> /yr

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

**Company Name:** Dragon / ESP-Midwest, Ltd.  
**Address City IN Zip:** 8857 East State Road 14, Akron, Indiana 46910  
**Permit Number:** F049-27195-00008  
**Permit Reviewer:** Sandra Carr  
**Application Date:** December 1, 2008

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC /gal solids	Transfer Efficiency
<b>CONTAINERS</b>																
CARBOTHANE SELF PRIMING																
Carbothane 8812 Part A	9.48	35.00%	0.00%	35.00%	0.00%	53.50%	8.00	1.250	3.32	3.32	33.18	796.32	145.33	67.47	6.20	75%
Urethane Converter 8800	8.34	50.00%	0.00%	50.00%	0.00%	52.00%	2.00	1.250	4.17	4.17	10.43	250.20	45.66	11.42	8.02	75%
<b>As Applied</b>	<b>9.87</b>	<b>33.70%</b>	<b>0.00%</b>	<b>33.70%</b>	<b>0.00%</b>	<b>53.50%</b>	<b>10.00</b>	<b>1.250</b>	<b>3.33</b>	<b>3.33</b>	<b>41.58</b>	<b>997.86</b>	<b>182.11</b>	<b>89.57</b>	<b>6.22</b>	<b>75%</b>
<b>FRAC TANKS</b>																
Ztech Undercoat RTS																
Ztech Undercoat RTS	10.40	39.96%	39.00%	0.96%	48.63%	45.00%	5.00	0.625	0.10	0.10	0.31	7.49	1.37	21.37	0.22	75%
PHENOLINE 310 SELF PRIMING																
Phenoline 310 Part A	10.34	0.10%	0.00%	0.10%	0.00%	99.00%	24.00	0.625	0.01	0.01	0.16	3.72	0.68	169.66	0.01	75%
Phenoline 310 Part B	8.84	0.10%	0.00%	0.10%	0.00%	99.00%	6.00	0.625	0.01	0.01	0.03	0.80	0.15	36.26	0.01	75%
<b>As Applied</b>	<b>10.16</b>	<b>0.10%</b>	<b>0.00%</b>	<b>0.10%</b>	<b>0.00%</b>	<b>99.80%</b>	<b>30.00</b>	<b>0.625</b>	<b>0.01</b>	<b>0.01</b>	<b>0.19</b>	<b>4.57</b>	<b>0.83</b>	<b>208.39</b>	<b>0.01</b>	<b>75%</b>
DEVMAT 101																
Devmat 101 Epoxy Base	10.79	2.43%	0.00%	2.43%	0.00%	96.50%	20.00	0.625	0.26	0.26	3.28	78.66	14.36	144.10	0.27	75%
Devmat 101 Epoxy Converter	11.34	23.36%	0.00%	23.36%	0.00%	71.85%	10.00	0.625	2.65	2.65	16.56	397.35	72.52	59.48	3.69	75%
<b>As Applied</b>	<b>10.97</b>	<b>9.64%</b>	<b>0.00%</b>	<b>9.64%</b>	<b>0.00%</b>	<b>100.00%</b>	<b>30.00</b>	<b>0.625</b>	<b>1.06</b>	<b>0.08</b>	<b>1.50</b>	<b>36.00</b>	<b>6.57</b>	<b>203.52</b>	<b>1.06</b>	<b>75%</b>
DEVTHANE 359H																
Devthane 359H Urethane Base	9.33	28.69%	0.00%	23.47%	0.00%	64.10%	16.00	0.625	2.34	2.19	21.90	525.61	95.92	72.86	3.65	75%
Devthane 379 Urethane Converter	9.40	10.00%	0.00%	10.00%	0.00%	87.00%	4.00	0.625	0.94	0.94	2.35	56.40	10.29	23.16	1.08	75%
<b>As Applied</b>	<b>9.34</b>	<b>24.93%</b>	<b>0.00%</b>	<b>24.93%</b>	<b>0.00%</b>	<b>68.68%</b>	<b>20.00</b>	<b>0.625</b>	<b>2.06</b>	<b>2.33</b>	<b>29.10</b>	<b>698.42</b>	<b>127.46</b>	<b>95.98</b>	<b>3.39</b>	<b>75%</b>
<b>CLEANERS</b>																
Acetone	6.55	100.00%	0.00%	100.00%	0.00%	0.00%	0.183	0.625	6.55	6.55	0.75	17.98	3.28	0.00	N/A	75%
	<b>6.55</b>			<b>100.00%</b>			<b>0.183</b>	<b>0.625</b>								

PM Control Efficiency:

90.00%

VOC (tpy)

PM (tpy)

State Potential Emissions

Add worst case coating to all solvents

<b>Uncontrolled</b>	42.33	1015.84	<b>185.39</b>	<b>325.73</b>
<b>Controlled</b>	42.33	1015.84	<b>185.39</b>	<b>32.57</b>

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

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

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

**NOTES:**

- Phenoline 310 is a substitute for Devthane 101
- Containers are an alternate product and use less paint.
- Containers are worst-case for HAP, Frac tanks are worst-case for VOC & PM
- Controlled PM emissions for NiSb = 6.93 tons/yr \* (1-90% control) = **0.65** tons PM / yr.

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

**Company Name:** Dragon / ESP-Midwest, Ltd.  
**Address City IN Zip:** 8857 East State Road 14, Akron, Indiana 46910  
**Permit Number:** F049-27195-00008  
**Permit Reviewer:** Sandra Carr  
**Application Date:** December 1, 2008

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Transfer Efficiency (%)	Weight % Xylene	Weight % Ethylbenzene	Weight % NiSb	Weight % Cumene	Weight % Other HAP	Xylene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	NiSb Emissions (ton/yr)	Cumene Emissions (ton/yr)	Other HAP Emissions (ton/yr)	Total HAP Emissions (ton/yr)
												(*Solid)			
<b>CONTAINERS</b>															
CARBOTHANE SELF PRIMING															
Carbothane 8812 Part A	9.48	8.00	1.250	75%	0.26%	0.06%	8.80%	0.01%	0.00%	1.08	0.26	5.94	0.02	0.00	7.31
Urethane Converter 8800	8.34	2.00	1.250	75%	0.15%	0.03%	0.00%	0.08%	0.20%	0.14	0.02	0.00	0.07	0.18	0.41
<b>As applied</b>	<b>9.87</b>	<b>10.00</b>	<b>1.250</b>	<b>75%</b>	<b>2.13%</b>	<b>0.71%</b>	<b>7.29%</b>	<b>0.00%</b>	<b>0.00%</b>	<b>11.51</b>	<b>3.84</b>	<b>6.53</b>	<b>0.00</b>	<b>0.00</b>	<b>21.88</b>
<b>FRAC TANKS</b>															
Ztech Undercoat RTS															
Ztech Undercoat RTS	10.40	5.00	0.625	75%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
PHENOLINE 310 SELF PRIMING															
Phenoline 310 Part A															
Phenoline 310 Part A	10.34	24.00	0.625	75%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Penoline 310 Part B															
Penoline 310 Part B	8.84	6.00	0.625	75%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
<b>As applied</b>	<b>10.16</b>	<b>30.00</b>	<b>0.625</b>	<b>75%</b>						<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
DEVMAT 101															
Devmat 101 Epoxy Base															
Devmat 101 Epoxy Base	10.79	20.00	0.625	75%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Devmat 101 Epoxy Converter															
Devmat 101 Epoxy Converter	11.34	10.00	0.625	75%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
<b>As applied</b>	<b>11.00</b>	<b>30.00</b>	<b>0.625</b>	<b>75%</b>						<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
DEVTHANE 359H															
Devthane 359H Urethane Base															
Devthane 359H Urethane Base	9.33	16.00	0.625	75%	0.26%	0.06%	0.00%	0.01%	0.02%	1.07	0.26	0.00	0.03	0.08	1.43
Devthane 359H Urethane Converter															
Devthane 359H Urethane Converter	9.40	4.00	0.625	75%	0.15%	0.03%	0.00%	0.08%	0.20%	0.15	0.03	0.00	0.08	0.21	0.47
<b>As applied</b>	<b>9.34</b>	<b>20.00</b>	<b>0.625</b>	<b>75%</b>	<b>0.24%</b>	<b>0.05%</b>	<b>0.00%</b>	<b>0.02%</b>	<b>0.06%</b>	<b>1.23</b>	<b>0.26</b>	<b>0.00</b>	<b>0.10</b>	<b>0.31</b>	<b>1.91</b>
<b>CLEANERS</b>															
Acetone															
Acetone	6.55	0.183	0.625	75%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
	<b>6.55</b>	<b>0.18</b>	<b>0.625</b>												
<b>Total:</b>										<b>11.51</b>	<b>3.84</b>	<b>6.53</b>	<b>0.10</b>	<b>0.31</b>	<b>21.88</b>

**Total HAP Worst Case**

**METHODOLOGY**

Highest Single HAP = Xylene

\* = NiSb is a solid and will have particulate emissions. The emissions are controlled by dry filter in the paint booth. Emissions of PM will be calculated using the formula used on the surface coating2 worksheet. Contolled NiSb particulate emissions are shown on the surface coating2 spreadsheet, Note #4.

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

**Appendix A: Emissions Calculations**  
**Welding and Thermal Cutting**

**Company Name: Dragon / ESP-Midwest, Ltd.**  
**Address City IN Zip: 8857 East State Road 14, Akron, Indiana 46910**  
**Permit Number: F049-27195-00008**  
**Permit Reviewer: Sandra Carr**  
**Application Date: December 1, 2008**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	Max. electrode Consumption lbs per year	EMISSION FACTORS* (lb pollutant/lb electrode)						
				PM = PM <sub>10</sub>	Co	Cr <sup>+3</sup>	Cr <sup>+6</sup>	Mn	Ni	Pb
WELDING										
Submerged Arc	0	0		3.60E-02				1.10E-02		
Metal Inert Gas (MIG)(carbon steel)	55	3	1,445,400	1.80E-03	4.64E-04	1.30E-05	8.00E-04	2.58E-04	5.16E-06	1.62E-04
Stick (E7018 electrode)	0	0		2.11E-02				9.00E-04		
Tungsten Inert Gas (TIG)(carbon steel)	0	0		5.50E-03				5.00E-04		
Oxyacetylene(carbon steel)	0	0		5.50E-03				5.00E-04		
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)**						
				PM = PM <sub>10</sub>	Co	Cr <sup>+3</sup>	Cr <sup>+6</sup>	Mn	Ni	Pb
Oxyacetylene	10	0.25	20	1.62E-01	1.62E-04		3.00E-04	5.00E-04	1.00E-04	
Oxymethane	0	0	0	8.15E-02			2.00E-04	2.00E-04		
Plasma**	1	1	20	3.90E-03						

See the following page for totals.

**METHODOLOGY**

Inches of metal cut when operating at Maximum Capacity= 21,024,000 inches/year or 1,752,000 feet/year.

MIG Emission Factors are worst case for two types of rods/wires: AWS ER70S & Jetweld LH-3800.

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

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick r. Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs.

Emissions, tons/yr = emissions, lb/hr x 8,760 hr

Welding and other flame cutting emission factors are from an internal training session document, "Welding and Flame Cutting". See Rebecca Mason if you need a copy.

Refer to AP-42, Chapter 12.19 for additional emission factors for welding.

**Appendix A: Emissions Calculations  
Welding and Thermal Cutting**

**Company Name: Dragon / ESP-Midwest, Ltd.**  
**Address City IN Zip: 8857 East State Road 14, Akron, Indiana 46910**  
**Permit Number: F049-27195-00008**  
**Permit Reviewer: Sandra Carr**  
**Application Date: December 1, 2008**

PROCESS	EMISSIONS (lbs/hr)							Total HAP (lbs/hr)
	PM = PM <sub>10</sub> (lbs/hr)	Co (lbs/hr)	Cr <sup>+3</sup> (lbs/hr)	Cr <sup>+6</sup> (lbs/hr)	Mn (lbs/hr)	Ni (lbs/hr)	Pb (lbs/hr)	
WELDING								
Submerged Arc	0.000				0.000	0.000	0	0.000
Metal Inert Gas (MIG)(carbon steel)	0.297	0.077	0.002	0.132	0.043	0.001	0.027	0.281
Stick (E7018 electrode)	0.000				0.000	0.000	0	0.000
Tungsten Inert Gas (TIG)(carbon steel)	0.000				0.000	0.000	0	0.000
Oxyacetylene(carbon steel)	0.000				0.000	0.000	0	0.000
FLAME CUTTING								
Oxyacetylene	0.487	0.000		0.001	0.002	0.000	0.000	0.003
Oxymethane	0.000			0.000	0.000	0.000	0.000	0.000
Plasma**	0.005				0.000	0.000	0.000	0.000
<b>EMISSION TOTALS</b>								
	(lbs/hr)	(lbs/hr)	(lbs/hr)	(lbs/hr)	(lbs/hr)	(lbs/hr)	(lbs/hr)	(lbs/hr)
	0.788	0.077	0.002	0.133	0.044	0.001	0.027	0.28
	(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)	(lbs/day)
	18.92	1.85	0.05	3.19	1.06	0.02	0.64	6.81
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
	<b>3.45</b>	<b>0.34</b>	<b>0.01</b>	<b>0.58</b>	<b>0.19</b>	<b>0.004</b>	<b>0.12</b>	<b>1.24</b>
	<b>PM/PM<sub>10</sub></b>	<b>Co</b>	<b>Cr<sup>+3</sup></b>	<b>Cr<sup>+6</sup></b>	<b>Mn</b>	<b>Ni</b>	<b>Pb</b>	<b>Total HAP</b>

Highest Single HAP = 

0.58 Cr+6
--------------

**Appendix A: Emission Calculations**  
**LPG-Propane -Commercial Boilers**  
(Heat input capacity: > .3 MMBtu/hr and < 10 MMBtu/hr)

**Company Name:** Dragon / ESP-Midwest, Ltd.  
**Address City IN Zip:** 8857 East State Road 14, Akron, Indiana 46910  
**Permit Number:** F049-27195-00008  
**Permit Reviewer:** Sandra Carr  
**Application Date:** December 1, 2008

Unit	Capacity (MMBtu/hr)
H-1	0.1
H-2	0.1
H-3	0.3
<b>Total</b>	<b>0.50</b>

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
kgals/year

SO<sub>2</sub> Emission factor = 0.10 x S

S = Sulfur Content =  grains/100ft<sup>3</sup>

Emission Factor in lb/kgal	Pollutant						
	PM*	PM <sub>10</sub> *	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
	0.2	0.2	0.2	0.1 (0.10S)	13.0	0.1 **TOC value	7.5
Potential Emission in tons/yr	0.005	0.005	0.005	0.001	0.303	0.002	0.175

\*PM emission factor is filterable PM only. PM<sub>10</sub> emission factor is assumed to be the same as PM based on a footnote in Table 1.5-1, therefore PM<sub>10</sub> is filterable only as well.

\*\*The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

### Methodology

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-03-010-02)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0940 MMBtu

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

\*\*\* SCREEN3 MODEL RUN \*\*\*  
\*\*\* VERSION DATED 96043 \*\*\*

27195\_Dragon

SIMPLE TERRAIN INPUTS:

SOURCE TYPE = POINT  
EMISSION RATE (G/S) = .936180  
STACK HEIGHT (M) = 7.6200  
STK INSIDE DIAM (M) = .8600  
STK EXIT VELOCITY (M/S)= 17.6600  
STK GAS EXIT TEMP (K) = 294.2600  
AMBIENT AIR TEMP (K) = 293.0000  
RECEPTOR HEIGHT (M) = .0000  
URBAN/RURAL OPTION = RURAL  
BUILDING HEIGHT (M) = .0000  
MIN HORIZ BLDG DIM (M) = .0000  
MAX HORIZ BLDG DIM (M) = .0000

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.  
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

BUOY. FLUX = .137 M\*\*4/S\*\*3; MOM. FLUX = 57.419 M\*\*4/S\*\*2.

\*\*\* FULL METEOROLOGY \*\*\*

\*\*\*\*\*  
\*\*\* SCREEN AUTOMATED DISTANCES \*\*\*  
\*\*\*\*\*

\*\*\* TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES \*\*\*

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
183.	92.87	3	4.5	4.5	1440.0	17.75	21.95	13.25	NO
200.	90.78	3	4.0	4.0	1280.0	19.01	23.84	14.40	NO
300.	84.80	4	5.0	5.0	1600.0	16.73	22.76	12.37	NO
400.	89.01	5	1.0	1.0	10000.0	27.19	22.71	12.17	NO
500.	116.4	5	1.0	1.0	10000.0	27.19	27.59	13.97	NO
600.	131.1	5	1.0	1.0	10000.0	27.19	32.42	15.72	NO
700.	136.2	5	1.0	1.0	10000.0	27.19	37.19	17.43	NO
800.	135.2	5	1.0	1.0	10000.0	27.19	41.92	19.10	NO
900.	130.6	5	1.0	1.0	10000.0	27.19	46.60	20.74	NO
1000.	135.0	6	1.0	1.0	10000.0	25.44	34.26	14.85	NO

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 183. M:  
727. 136.4 5 1.0 1.0 10000.0 27.19 38.52 17.91 NO

DWASH= MEANS NO CALC MADE (CONC = 0.0)  
DWASH=NO MEANS NO BUILDING DOWNWASH USED  
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED  
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED  
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3\*LB

\*\*\*\*\*

\*\*\* SUMMARY OF SCREEN MODEL RESULTS \*\*\*

\*\*\*\*\*

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
----- SIMPLE TERRAIN	----- 136.4	----- 727.	----- 0.

\*\*\*\*\*

\*\* REMEMBER TO INCLUDE BACKGROUND CONCENTRATIONS \*\*

\*\*\*\*\*

*Minor Source Criteria Pollutant Modeling  
Screening Form - Raw Data*

**Permit Summary**

**Permit Number:** F 049-27195-00008  
**Company Name:** Dragon/ESP-Midwest, Ltd.  
**Source Location:** 8857 East State Road 14, Akron, Indiana 46910  
**County:** Fulton  
**SIC Code:** 3444  
**Permit Reviewer:** S. Carr

**Source Specific Information**

**TABLE 1 - Pollutant Emission Rates (lb/hr) - based on the highest allowable emissions rate**

Unit ID	Stack ID	CO	NO <sub>x</sub>	PM <sub>10</sub>	Pb	SO <sub>2</sub>
EU-01	S-3			7.43		
<i>Max. Emissions Rate (lb/hr):</i>		0	0	7.43	0	0

**TABLE 2 - Stack Information: (all heights are from ground level)**

For non-circular stacks, take the average of the stack dimensions as the stack diameter.  
If there is no building near the stack, zero out the building height, width, and length.

Stack ID	Stack Height (ft)	Flow Rate (acfm)	Stack Temp. (°F)	Stack Diameter (ft)	Closest building related to stack:			Closest Property Line (ft)
					Height (ft)	Width (ft)	Length (ft)	
S-3	25	21850	70	2.83	0	0	0	600
0								
0								
0								
0								

Minor Source Criteria Pollutant Modeling  
SCREEN3 Data

**Permit Summary**

Permit Number: F 049-27195-00008  
 Company Name: Dragon/ESP-Midwest, Ltd.  
 Source Location: 8857 East State Road 14, Akron, Indiana 46910  
 County: Fulton  
 SIC Code: 3444  
 Permit Reviewer: S. Carr

**SCREEN3 Modeling Data**

**TABLE 3 - Pollutant Modeling Data - grams per second**

Pollutant:	CO	NO <sub>x</sub>	PM <sub>10</sub>	Pb	SO <sub>2</sub>
Totals (g/s):	0	0	0.93618	0	0

**TABLE 4 - Stack Modeling Data**

The M-Value is calculated using a unit emission rate of 1 g/s.  
 The stack with the lowest M value represents the lowest dispersion coefficient and should be modeled.

Stack ID	Stack Height (m)	Stack Gas Velocity (m/s)	Stack Temp. (K)	Stack Diameter (m)	Closest building related to stack			Closest Property Line (m)	Volumetric Flow Rate (m <sup>3</sup> /s)	Stack M-Value
					Height (m)	Width (m)	Length (m)			
S-3	7.62195122	17.65972024	294.26	0.862804878	0	0	0	182.9268293	10.32523393	39607.99467
0	0	#DIV/0!	255.37	0	0	0	0	0	#DIV/0!	#DIV/0!
0	0	#DIV/0!	255.37	0	0	0	0	0	#DIV/0!	#DIV/0!
0	0	#DIV/0!	255.37	0	0	0	0	0	#DIV/0!	#DIV/0!
0	0	#DIV/0!	255.37	0	0	0	0	0	#DIV/0!	#DIV/0!

*Minor Source Criteria Pollutant Modeling  
Screening Form - Modeling Results*

**Permit Summary**

Permit Number: F 049-27195-00008  
 Company Name: Dragon/ESP-Midwest, Ltd.  
 Source Location: 8857 East State Road 14, Akron, Indiana 46910  
 County: Fulton  
 SIC Code: 3444  
 Permit Reviewer: S. Carr

**Modeling Method**

Model Used (please check one):

SCREEN3     AERSCREEN  
 ISC3         AERMOD

Date Modeling Completed: 3/17/2009

Modeler: Sandra Carr

**Modeling Results**

**TABLE 5 - Pollutants Modeling Results: 1 Hour Concentration ( $\mu\text{g}/\text{m}^3$ ):**

The modeled concentrations in this table are the 1-hour concentrations for each pollutant. Use tables 6 and 7 to compare the modeled data to the air quality standard.

Pollutant:	CO	NO <sub>x</sub>	PM <sub>10</sub>	Pb	SO <sub>2</sub>
Concentration ( $\mu\text{g}/\text{m}^3$ ):			136.4		

**TABLE 6 - Pollutants Maximum Concentration ( $\mu\text{g}/\text{m}^3$ ):**

Averaging Period	CO	NO <sub>x</sub>	PM <sub>10</sub>	Pb	SO <sub>2</sub>
1-hour modeled concentration	0				
<b>NAAQ Standard</b>	<b>40000</b>				
<b>PASS or FAIL</b>	PASS				
3-hour modeled concentration					0
<b>NAAQ Standard</b>					<b>1300</b>
<b>PASS or FAIL</b>					PASS
8-hour modeled concentration	0				
<b>NAAQ Standard/CEP Benchmark</b>	<b>10000</b>				
<b>PASS or FAIL</b>	PASS				
24-hour modeled concentration			54.56	0	0
<b>NAAQ Standard</b>			<b>150</b>	<b>1.5</b>	<b>365</b>
<b>PASS or FAIL</b>			PASS	PASS	PASS
Annual modeled concentration		0	10.912		0
<b>NAAQ Standard/CEP Benchmark</b>		<b>100</b>	<b>50</b>		<b>80</b>
<b>PASS or FAIL</b>		PASS	PASS		PASS



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

## **SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED**

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

**DATE:** July 27, 2009

**FROM:** Matt Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

**SUBJECT:** Final Decision  
FESOP  
049-27195-00008

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
Doug Fierce (Dragon/ESP-Midwest, Ltd.)  
Mr. John W. Kilmer (BCA Consultants)  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

July 27, 2009

TO: Akron Carnegie Public Library

From: Matthew Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

**Applicant Name: Dragon/ESP-Midwest, Ltd.**  
**Permit Number: 049-27195-00008**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures  
Final Library.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

TO: Interested Parties / Applicant

DATE: July 27, 2009

RE: Dragon/ESP-Midwest, Ltd. / 049-27195-00008

FROM: Matthew Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

In order to conserve paper and reduce postage costs, IDEM's Office of Air Quality is now sending many permit decisions on CDs in Adobe PDF format. The enclosed CD contains information regarding the company named above.

This permit is also available on the IDEM website at:  
<http://www.in.gov/ai/appfiles/idem-caats/>

If you would like to request a paper copy of the permit document, please contact IDEM's central file room at:

Indiana Government Center North, Room 1201  
100 North Senate Avenue, MC 50-07  
Indianapolis, IN 46204  
Phone: 1-800-451-6027 (ext. 4-0965)  
Fax (317) 232-8659

**Please Note:** *If you feel you have received this information in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at [PPEAR@IDEM.IN.GOV](mailto:PPEAR@IDEM.IN.GOV).*

Enclosures  
CD Memo.dot 11/14/08

# Mail Code 61-53

IDEM Staff	CDENNY 7/27/2009 Dragon/ESP-Midwest, Ltd.049-27195-00008 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Rob Girton Dragon/ESP-Midwest, Ltd. 8857 E SR 14 Akron IN 46910 (Source CAATS) VIA CONFIRMED DELIVERY										
2		Doug Fierce Chief Operating Officer Dragon/ESP-Midwest, Ltd. 1655 Louisiana Beaumont TX 77701 (RO CAATS)										
3		Kathryn Prater 1509 S. 925 E. Akron IN 46910 (Affected Party)										
4		Akron Carnegie Public Library 205 E Rochester St Akron IN 46910-0428 (Library)										
5		Fulton County Commissioners 1093 E 600 N Rochester IN 46975 (Local Official)										
6		Leonard Kuhn 2767 E. 800 N. Brazil IN 47834 (Affected Party)										
7		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
8		Fulton County Health Department 125 E 9th Street #125 Rochester IN 46975-7119 (Health Department)										
9		Mr. John W. Kilmer BCA Consultants, Inc. 6330 E 75th Street #150 Indianapolis IN 46250 (Consultant)										
10		Akron Town Council P.O. Box 218 Akron IN 46910 (Local Official)										
11		Mr. David & Susan Weber 9048 E. St. Rd. 14 Akron IN 46910 (Affected Party)										
12		Mrs. Mary Eryman 1067 S. 900 E. Akron IN 46910 (Affected Party)										
13		Mr. Richard & Marjory Ludwig 1215 Madison Rochester IN 46995 (Affected Party)										
14		Mr. Dennis Grinstead 9086 E. St. Rd. 14 Akron IN 46910 (Affected Party)										
15		Mrs. Jill & Douglass Sampsel 746 S. 900 E. Akron IN 46910 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
14			

# Mail Code 61-53

IDEM Staff	CDENNY 7/27/2009 Dragon/ESP-Midwest, Ltd.049-27195-00008 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Mary Best 8980 E. St. Rd. 14 Akron IN 46910 (Affected Party)										
2		Mr. Steve Bell 1501 S. 875 E. Akron IN 46910 (Affected Party)										
3		Scott Melton 3837 S 500 E Rochester IN 46975 (Affected Party)										
4		Christina Seiler The Sentinel PO Box 108 Rochester IN 46975 (Newspaper)										
5		Shane Blair 822 Main St Rochester IN 46975 (Affected Party)										
6		Mr. Patrick Silveus 515 E. Main St. Mentone IN 46539 (Affected Party)										
7												
8												
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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