



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: September 8, 2010

RE: Tell City Boat Works, Inc. / 123-29238-00026

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 and New Source Review OFFICE OF AIR QUALITY

**Tell City Boat Works, Inc.
926 South Boundary Street
Tell City, Indiana 47586**

(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.: F123-29238-00026	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 8, 2010 Expiration Date: September 8, 2015

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary ship building and repair; marine barges and vessels manufacturer.

Source Address:	926 South Boundary Street, Tell City, Indiana 47586
General Source Phone Number:	(812) 529-8211
SIC Code:	3731
County Location:	Perry
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)]

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

- (a) One (1) outside metal paint area, identified as 05, constructed in 2009, using no control devices and exhausting outside, using two (2) High Volume Low Pressure (HVLPP) spray guns with a maximum rate of 1.4 gallons per hour.
- (b) Cutting operation, identified as 02, constructed in 2009 and modified in 2010, using no controls, consisting of:
 - (1) Twenty (20) HPG/oxygen torch stations (18 manual and 2 machine cutting), with a maximum cutting rate of 0.50 inches steel at twelve (12) inches per minute.
 - (2) One (1) plasma arc cutter, with a maximum cutting rate of 0.50 inches of steel at 3.75 feet per minute.
- (c) Welding operation, identified as 03, constructed in 2009 and modified in 2010, consisting of:
 - (1) Thirty (30) SMAW stations, with a maximum consumption of 2.77 pounds of electrode per hour, with no control device and exhausting outdoors.
 - (2) Sixty-five (65) FCAW stations, with a maximum consumption of 28.6 pounds of electrode per hour, with no control device and exhausting outdoors.
 - (3) Two (2) SAW stations, with a maximum consumption of 2.17 pounds of electrode per hour, with no control device and exhausting outdoors.
- (d) Fuel Consumption, Handling and Storage, identified as 04, approved for construction in 2010, with the following equipment:

- (1) One (1) diesel powered lift crane, identified as 101, rated at 625 horsepower; and
- (2) Two (2) diesel powered lift cranes, identified as 102 and 103, rated at 300 horsepower; and
- (3) Two (2) diesel powered lift cranes, identified as 104 and 105, rated at 275 horsepower.

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

This stationary source also includes the following insignificant activities:

- (a) Water related activities including [326 IAC 2-7-1(40)(B)]:
 - (1) Production of hot water for on-site personal use not related to any industrial or production process; and
 - (2) Pressure washing of equipment.
- (b) Combustion activities including the following [326 IAC 2-421(40)(C)]:
 - (1) Combustion emissions from propulsion of mobile sources; and
 - (2) Indoor and outdoor kerosene heaters.
- (c) Activities related to ventilation, venting equipment and refrigeration, including the following [326 IAC 2-7-1(40)(D)]:
 - (1) Ventilation exhaust, central chiller water systems, refrigeration and air conditioning equipment, not related to any industrial or production process, including natural drafts hoods or ventilating systems that do not remove air pollutants; and
 - (2) Air vents from air compressors.
- (d) Activities related to routine fabrication, maintenance and repair of buildings, structures, equipment or vehicles at the source where air emissions from those activities would not be associated with any commercial production process including the following [326 IAC 2-7-1(40)(E)]:
 - (1) Activities associated with the repair and maintenance of paved and unpaved roads, including paving or sealing, or both, of parking lots and roadways; and
 - (2) Painting, including interior and exterior painting of buildings, and solvent use, excluding degreasing operations utilizing halogenated organic solvents; and
 - (3) Blast-cleaning equipment using water as the suspension agent and associated equipment; and
 - (4) Batteries and battery charging stations; and
 - (5) Lubrication, including hand-held spray can lubrication, dipping metal parts into lubricating oil, and manual or automated addition of cutting oil in machining operations; and
 - (6) Manual tank gauging.

- (e) Activities performed using hand-held equipment including the following [326 IAC 2-7-1(40)(F)]:
 - (1) Cutting, excluding cutting torches; and
 - (2) Machining wood, metal, or plastic; and
 - (3) Drilling, grinding, sanding and sawing.

- (f) Housekeeping and janitorial activities and supplies including the following [326 IAC 2-7-1(40)(G)]:
 - (1) Vacuum cleaning systems used exclusively for housekeeping or custodial activities, or both; and
 - (2) Rest rooms and associated cleanup operations and supplies; and
 - (3) Pest control fumigation.

- (g) Office related activities including the following [326 IAC 2-7-1(40)(H)]:
 - (1) Office supplies and equipment; and
 - (2) Photocopying equipment and associated supplies; and
 - (3) Paper shredding.

- (h) Storage equipment and activities including [326 IAC 2-7-1(40)(J)]:
 - (1) Pressurized storage tanks and associated piping for: Acetylene, Liquid petroleum gas (LPG) and Liquid natural gas (LNG) (propane); and
 - (2) Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOC or HAP; and
 - (3) Storage tanks, reservoirs, and pumping and handling equipment of any size containing soap, wax, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized; and
 - (4) Storage of drums containing maintenance raw materials; and
 - (5) Portable containers used for the collection, storage, or disposal of materials provided the container capacity is equal to or less than forty-six hundredths (0.46) cubic meters and the container is closed except when the material is added or removed.

- (i) Safety and emergency equipment, except engine driven fire pumps, including fire suppression systems and emergency road flares [326 IAC 2-7-1(40)(K)].

- (j) Activities generating limited amounts of fugitive dust including [326 IAC 2-7-1(40)(O)]:
 - (1) Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes under 326 IAC 2-7-1(22)(B), and any required fugitive dust control plan or its equivalent is submitted; and
 - (2) Road salting and sanding.

- (k) Activities associated with production including the following [326 IAC 2-7-1(40)(P)]:
 - (1) Drop hammers or hydraulic presses for forging or metalworking; and
 - (2) Air compressors and pneumatically operated equipment, including hand tools; and
 - (3) Compressor or pump lubrication and seal oil systems; and
 - (4) Handling of solid steel, including coils and slabs, excluding scrap burning, scarfing, and charging into steel making furnaces and vessels.
- (l) Miscellaneous equipment, but not emissions associated with the process for which the equipment is used, and activities including the following [326 IAC 2-7-1(40)(Q)]:
 - (1) Manual loading and unloading operations; and
 - (2) Construction and demolition operations
- (m) Combustion related activities, including the following [326 IAC 2-7-1(21)(G)(i)]:
 - (1) Space heaters, process heaters, or boilers using the following fuels:
 - (A) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour; and
 - (B) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour; and
 - (C) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths percent (0.5%) sulfur by weight.
 - (2) Equipment powered by diesel fuel fired or natural gas fired internal combustion engines of capacity equal to or less than five hundred thousand (500,000) Btu/hour, except where total capacity of equipment operated by one stationary source exceeds two million (2,000,000) Btu/hour.
- (n) A petroleum fuel, other than gasoline, dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less.
- (o) The following VOC and HAP storage vessels: hydraulic oils, lubricating oils, machining oils and machining fluids [326 IAC 2-7-1(21)(G)(iii)].
- (p) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (q) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (r) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than 3,500 gallons per day or less [326 IAC 2-7-1(21)(G)(ii)].

- (s) Asbestos abatement projects regulated by 326 IAC 14-10 [326 IAC 2-7-1(21)(G)(xvi)].
- (t) Routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process, including the following: purging of gas lines and purging of vessels [326 IAC2-7-1(21)(G)(xvii)].
- (u) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including the following: catch tanks, temporary liquid separators, and tanks [326 IAC2-7-1(21)(G)(xix)].
- (v) Metal cutoff saw with slow RMP, identified as 02, equipped with a mist collection system for particulate control, constructed in 2010, with a capacity of 25 gallons of oil per year.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F123-29238-00026, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

- (i) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
- (ii) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent 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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date 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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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, or Southwest 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 Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304.

- (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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.

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

- (a) All terms and conditions of permits established prior to F123-29238-00026 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 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

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

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

Indiana Department of Environmental Management
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 does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

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

Indiana Department of Environmental Management
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.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

B.21 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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.22 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 no later than 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.23 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

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 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
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 that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

- (a) For performance testing required by this permit, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

C.15 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.16 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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 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 except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. 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.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) outside metal paint area, identified as 05, constructed in 2009, using no control devices and exhausting outside, using two (2) High Volume Low Pressure (HVLP) spray guns with a maximum rate of 1.4 gallons per hour.

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

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

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

- (a) Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere volatile organic compound (VOC) from application equipment of the outdoor paint area in excess of 3.5 pounds of VOC per gallon of coating less water delivered to a coating applicator that applies extreme performance coatings
- (b) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from application equipment of the outdoor paint area 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 evaporation is minimized.

D.1.2 Hazardous Air Pollutants (HAP) Limitations [326 IAC 2-4.1] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the hazardous air pollutants delivered to the outdoor paint area, shall be limited as follows:

- (a) The total input of any single HAP to the outdoor paint area, shall not exceed 9.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The total input of any combination of HAPs to the outdoor paint area, shall not exceed 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit of HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per 12 consecutive month period and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) and 326 IAC 2-7 (Part 70 Permits) not applicable.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the outside paint area, identified as 05, shall be controlled by an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) 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.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limit in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (c \times U) / \sum U]$$

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U is the usage rate of the coating in gallons per day.

D.1.6 Particulate Control

In order to comply with Condition D.1.3 for particulate control the following work practice standards shall be followed at all times the outside paint area is in operation:

- (a) Surface coating operations are to be completed in such a manner that all particulate matter (drift or over spray) remains on the source's property.
- (b) Surface coating with high volume low pressure (HVLP) spray guns will be limited to times when the wind velocity is less than 10 mph.
- (c) Surface coating of flat horizontal surfaces of vessels will be accomplished by rolling or brushing when practical.
- (d) Coatings of inter compartments will be completed within enclosed spaces.
- (e) Surface coating of small parts/fixtures to be attached to vessels will be coated in open areas that are shrouded if needed and is practical.

Compliance Monitoring Requirements

D.1.7 Particulate

Wind velocity will be determined before the start of surface coating and rechecked hourly. If during surface coating operation, the wind velocity exceeds 10 mph; all surface coating with the high volume low pressure (HVLP) spray guns shall cease operations.

D.1.8 Operator Training Requirements

The Permittee shall implement an operator-training program.

- (a) All operators that perform surface coating operations using spray equipment shall be trained on the work practice standards in condition D.1.2. 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.
- (b) 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.

- (c) All operators shall be given refresher training annually.

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

D.1.9 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition D.1.1.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on daily 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 solvent.
 - (3) The volume weighted average VOC content of the coatings used for each day;
 - (4) The daily cleanup solvent usage; and
 - (5) The total VOC usage for each day.
- (b) To document the compliance status with Condition D.1.2, 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 HAPs content limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The HAPs content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a 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 single and combined HAPs usage for each month; and
 - (5) The total weight of HAPs emitted for each compliance period.
- (c) To document the compliance status with Condition D.1.6 the Permittee shall maintain a copy of the operator-training program and training records.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance status with D.1.2 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) Fuel Consumption, Handling and Storage, identified as 04, approved for construction in 2010, with the following equipment:
- (1) One (1) diesel powered lift crane, identified as 101, rated at 625 horsepower; and
 - (2) Two (2) diesel powered lift cranes, identified as 102 and 103, rated at 300 horsepower; and
 - (3) Two (2) diesel powered lift cranes, identified as 104 and 105, rated at 275 horsepower.

Insignificant Activities

- (m) Combustion related activities, including the following [326 IAC 2-7-1(21)(G)(i)]:
- (1) Space heaters, process heaters, or boilers using the following fuels:
 - (A) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour; and
 - (B) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour; and
 - (C) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths percent (0.5%) sulfur by weight.
 - (2) Equipment powered by diesel fuel fired or natural gas fired internal combustion engines of capacity equal to or less than five hundred thousand (500,000) Btu/hour, except where total capacity of equipment operated by one stationary source exceeds two million (2,000,000) Btu/hour

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

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

D.2.1 FESOP Limits [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following:

- (A) Diesel Fuel fired equipment with horsepower greater than 600 shall comply with the following:
- (1) No. 2 diesel fuel usage shall not exceed 20,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (2) NO_x emissions shall not exceed 0.445 pounds per gallon.
 - (3) CO emissions shall not exceed 0.118 pounds per gallon.

- (B) Diesel Fuel fired equipment with horsepower less than 600 shall comply with the following:
- (1) No. 2 diesel fuel usage shall not exceed 55,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (2) NOx emissions shall not exceed 0.613 pounds per gallon.
 - (3) CO emissions shall not exceed 0.132 pounds per gallon.
- (C) Space heaters using kerosene shall comply with the following:
- (1) Kerosene usage shall not exceed 20,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (2) NOx emissions shall not exceed 0.08 pounds per gallon.
 - (3) CO emissions shall not exceed 0.0002 pounds per gallon.

Compliance with these limits, combined with the potential to emit of NOx and CO from all other emission units at this source, shall limit the source-wide total potential to emit of NOx and CO to less than 100 tons per 12 consecutive month period, each and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable.

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

D.2.2 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.1, the Permittee shall maintain monthly records of the amount of No. 2 diesel fuel and kerosene combusted in the equipment rated greater than 600 horse power, equipment rated less than 600 horse power, and the kerosene space heaters.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition

D.2.3 Reporting Requirements

A quarterly summary of the information to document compliance status with D.2.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

Source Name: Tell City Boat Works, Inc.
Source Address: 926 South Boundary Street, Tell City, Indiana 47586
FESOP Permit No.: F123-29238-00026

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: Tell City Boat Works, Inc.
Source Address: 926 South Boundary Street, Tell City, Indiana 47586
FESOP Permit No.: F123-29238-00026

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Tell City Boat Works, Inc.
 Source Address: 926 South Boundary Street, Tell City, Indiana 47586
 FESOP Permit No.: F123-29238-00026
 Facility: Outside Paint Area, 05
 Parameter: Combined HAPs
 Limit: ≤ 9 tons of any Single HAP per 12 consecutive month period
 ≤ 24 tons of any combination of HAPs per 12 consecutive month period

Combination of HAPs: YEAR:

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

Single HAP: YEAR:

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

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

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

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

FESOP Quarterly Report

Source Name: Tell City Boat Works, Inc.
 Source Address: 926 South Boundary Street, Tell City, Indiana 47586
 FESOP Permit No.: F123-29238-00026
 Facility: Fuel Usage
 Parameter: Diesel and Kerosene Use
 Limit: ≤ 20,000 gallons of Diesel #2 used in equipment greater than 600 horsepower engines per 12 consecutive month period
 ≤ 55,000 gallons of Diesel #2 used in equipment less than 600 horsepower engines per 12 consecutive month period
 ≤ 20,000 gallons of Kerosene in Heaters per 12 consecutive month period

Diesel #2 in >600 HP: YEAR:

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

Diesel #2 in <600 HP: YEAR:

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

Kerosene: YEAR:

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**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: Tell City Boat Works, Inc.
 Source Address: 926 South Boundary Street, Tell City, Indiana 47586
 FESOP Permit No.: F123-29238-00026

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration Transitioning to a Federally Enforceable State Operating Permit (FESOP) and New Source Review

Source Description and Location

Source Name:	Tell City Boat Works, Inc.
Source Location:	926 South Boundary Street, Tell City, IN 47586
County:	Perry
SIC Code:	3731
FESOP No.:	123-29238-00026
Permit Reviewer:	Bruce Farrar

On May 10, 2010, the Office of Air Quality (OAQ) received an application from Tell City Boat Works, Inc. related to the transition of a Registration to a FESOP.

Existing Approvals

Due to this application, the source is transitioning from a Registration to a FESOP. Tell City Boat Works is adding additional emission units. The addition of these emission units will increase the potential to emit (PTE) above 100 tons per year for NO_x and CO. The combined HAPs total PTE will increase to over 25 tons per year. Therefore, Tell City Boat Works will be issued a FESOP.

County Attainment Status

The source is located in Perry County.

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

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

Unclassifiable or attainment effective April 5, 2005, for PM_{2.5}.

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Perry County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM2.5**
Perry County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 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 PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**
Perry County has been classified as attainment or unclassifiable in Indiana for pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Tell City Boat Works, Inc. on May 10, 2010, relating to the transition of a Registration to a FESOP.

The source consists of the following permitted emission units:

- (a) One (1) outside metal paint area, identified as 05, constructed in 2009, using no control devices and exhausting outside, using two (2) High Volume Low Pressure (HVLP) spray guns with a maximum rate of 0.34 gallons per hour.
- (b) Cutting operation, identified as 02, constructed in 2009, using no controls, consisting of Four (4) HPG/oxygen torch units (3 manual and 1 cutting machine), with a maximum cutting rate of 0.50 inch steel at six (6) inches per minute.
- (c) Welding operation, identified as 03, constructed in 2009, consisting of:
- (1) Ten (10) SMAW stations, with a maximum consumption of 0.64 pounds of electrode per hour, with no control device and exhausting outdoors.
- (2) Ten (10) FCAW stations, with a maximum consumption of 6.23 pounds of electrode per hour, with no control device and exhausting outdoors.
- (d) One (1) diesel powered lift crane, rated at 184 horsepower.
- (e) Indoor and outdoor kerosene heaters.
- (f) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (g) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (h) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than 3,500 gallons per day or less.

The source is modifying or adding the following emission units:

- (a) One (1) outside metal paint area, identified as 05, approved for modification in 2010, using no control devices and exhausting outside, using two (2) High Volume Low Pressure (HVLP) spray guns with a maximum rate of 1.4 gallons per hour.
- (b) Cutting operation, identified as 02, approved for modification in 2010, using no controls, consisting of:
 - (1) Twenty (20) HPG/oxygen torch stations (18 manual and 2 machine cutting), with a maximum cutting rate of 0.50 inches steel at twelve (12) inches per minute.
 - (2) One (1) plasma arc cutter, with a maximum cutting rate of 0.50 inches of steel at 3.75 feet per minute.
- (c) Welding operation, identified as 03, approved for modification in 2010, consisting of:
 - (1) Thirty (30) SMAW stations, with a maximum consumption of 2.77 pounds of electrode per hour, with no control device and exhausting outdoors.
 - (2) Sixty-five (65) FCAW stations, with a maximum consumption of 28.6 pounds of electrode per hour, with no control device and exhausting outdoors.
 - (3) Two (2) SAW stations, with a maximum consumption of 2.17 pounds of electrode per hour, with no control device and exhausting outdoors.
- (d) Fuel Consumption, Handling and Storage, identified as 04, approved for construction in 2010, with the following equipment:
 - (1) One (1) diesel powered lift crane, identified as 101, rated at 625 horsepower; and
 - (2) Two (2) diesel powered lift cranes, identified as 102 and 103, rated at 300 horsepower; and
 - (3) Two (2) diesel powered lift cranes, identified as 104 and 105, rated at 275 horsepower.
- (e) Insignificant activities consisting of the following:
 - (1) Water related activities including [326 IAC 2-7-1(40)(B)]:
 - (A) Production of hot water for on-site personal use not related to any industrial or production process; and
 - (B) Pressure washing of equipment.
 - (2) Combustion activities including the following [326 IAC 2-421(40)(C)]:
 - (A) Combustion emissions from propulsion of mobile sources; and
 - (B) Indoor and outdoor kerosene heaters.
 - (3) Activities related to ventilation, venting equipment and refrigeration, including the following [326 IAC 2-7-1(40)(D)]:
 - (A) Ventilation exhaust, central chiller water systems, refrigeration and air conditioning equipment, not related to any industrial or production process,

- including natural drafts hoods or ventilating systems that do not remove air pollutants; and
- (B) Air vents from air compressors.
- (4) Activities related to routine fabrication, maintenance and repair of buildings, structures, equipment or vehicles at the source where air emissions from those activities would not be associated with any commercial production process including the following [326 IAC 2-7-1(40)(E)]:
 - (A) Activities associated with the repair and maintenance of paved and unpaved roads, including paving or sealing, or both, of parking lots and roadways; and
 - (B) Painting, including interior and exterior painting of buildings, and solvent use, excluding degreasing operations utilizing halogenated organic solvents; and
 - (C) Blast-cleaning equipment using water as the suspension agent and associated equipment; and
 - (D) Batteries and battery charging stations; and
 - (E) Lubrication, including hand-held spray can lubrication, dipping metal parts into lubricating oil, and manual or automated addition of cutting oil in machining operations; and
 - (F) Manual tank gauging.
- (5) Activities performed using hand-held equipment including the following [326 IAC 2-7-1(40)(F)]:
 - (A) Cutting, excluding cutting torches; and
 - (B) Machining wood, metal, or plastic; and
 - (C) Drilling, grinding, sanding and sawing.
- (6) Housekeeping and janitorial activities and supplies including the following [326 IAC 2-7-1(40)(G)]:
 - (A) Vacuum cleaning systems used exclusively for housekeeping or custodial activities, or both; and
 - (B) Rest rooms and associated cleanup operations and supplies; and
 - (C) Pest control fumigation.
- (7) Office related activities including the following [326 IAC 2-7-1(40)(H)]:
 - (A) Office supplies and equipment; and
 - (B) Photocopying equipment and associated supplies; and
 - (C) Paper shredding.
- (8) Storage equipment and activities including [326 IAC 2-7-1(40)(J)]:

- (A) Pressurized storage tanks and associated piping for: Acetylene, Liquid petroleum gas (LPG) and Liquid natural gas (LNG) (propane); and
 - (B) Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOC or HAP; and
 - (C) Storage tanks, reservoirs, and pumping and handling equipment of any size containing soap, wax, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized; and
 - (D) Storage of drums containing maintenance raw materials; and
 - (E) Portable containers used for the collection, storage, or disposal of materials provided the container capacity is equal to or less than forty-six hundredths (0.46) cubic meters and the container is closed except when the material is added or removed.
- (9) Safety and emergency equipment, except engine driven fire pumps, including fire suppression systems and emergency road flares [326 IAC 2-7-1(40)(K)].
- (10) Activities generating limited amounts of fugitive dust including [326 IAC 2-7-1(40)(O)]:
- (A) Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes under 326 IAC 2-7-1(22)(B), and any required fugitive dust control plan or its equivalent is submitted; and
 - (B) Road salting and sanding.
- (11) Activities associated with production including the following [326 IAC 2-7-1(40)(P)]:
- (A) Drop hammers or hydraulic presses for forging or metalworking; and
 - (B) Air compressors and pneumatically operated equipment, including hand tools; and
 - (C) Compressor or pump lubrication and seal oil systems; and
 - (D) Handling of solid steel, including coils and slabs, excluding scrap burning, scarfing, and charging into steel making furnaces and vessels.
- (12) Miscellaneous equipment, but not emissions associated with the process for which the equipment is used, and activities including the following [326 IAC 2-7-1(40)(Q)]:
- (A) Manual loading and unloading operations; and
 - (B) Construction and demolition operations
- (13) Combustion related activities, including the following [326 IAC 2-7-1(21)(G)(i)]:
- (A) Space heaters, process heaters, or boilers using the following fuels:
 - (i) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour; and
 - (ii) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour;

and

- (iii) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths percent (0.5%) sulfur by weight.
- (B) Equipment powered by diesel fuel fired or natural gas fired internal combustion engines of capacity equal to or less than five hundred thousand (500,000) Btu/hour, except where total capacity of equipment operated by one stationary source exceeds two million (2,000,000) Btu/hour.
- (14) A petroleum fuel, other than gasoline, dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less.
- (15) The following VOC and HAP storage vessels: hydraulic oils, lubricating oils, machining oils and machining fluids [326 IAC 2-7-1(21)(G)(iii)].
- (16) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (17) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (18) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than 3,500 gallons per day or less [326 IAC 2-7-1(21)(G)(ii)].
- (19) Asbestos abatement projects regulated by 326 IAC 14-10 [326 IAC 2-7-1(21)(G)(xvi)].
- (20) Routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process, including the following: purging of gas lines and purging of vessels [326 IAC 2-7-1(21)(G)(xvii)].
- (21) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including the following: catch tanks, temporary liquid separators, and tanks [326 IAC 2-7-1(21)(G)(xix)].
- (22) Metal cutoff saw with slow RMP, identified as 02, equipped with a mist collection system for particulate control, constructed in 2010, with a capacity of 25 gallons of oil per year.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	61.60
PM10 ⁽¹⁾	60.46
PM2.5	60.46
SO ₂	84.10
NO _x	>250
VOC	76.52
CO	>100

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Xylene	8.01
Epichlorhydrin	7.79
Toluene	7.01
MIBK	2.21
Benzene	1.30
MEK	1.16
Methanol	0.21
Magnesium	0.73
Nickel	negl.
Chromium	negl.
TOTAL HAPs	28.84

The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of NO_x and CO is greater than 100 tons per year and the combined of HAPs is greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a FESOP (326 IAC 2-8), because the source will limit emissions of NO_x, CO and the combined HAPs to less than the Title V major source threshold levels.

PTE of the Entire Source After Issuance of the FESOP

The table below summarizes the potential to emit of the entire source after issuance of this FESOP, reflecting all limits, of the emission units. Any control equipment is considered federally 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	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Cutting, 02	1.79	1.79	1.79	-	-	19.7	-	9.71E-06	negl.
Welding, 03	1.33	1.33	1.33	-	-	-	-	0.75	0.73
Grinding, 04	5.62	5.62	5.62	-	-	-	-	-	-
Outside Paint Area, 05	19.79	19.79	19.79	-	-	39.35	-	<24	<9
Fuel Consumption, 06 ^α	1.35	1.35	1.35	4.65	22.11	1.49	4.81	-	-
Fugitive Emissions	3.39	0.87	0.87	-	-	-	-	-	-
Total PTE of Entire Source^β	29.87	29.87	29.87	4.65	22.11	40.84	4.81	<25	<10
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 (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". α – Source requested to limit fuel use to: 75,000 gallons of Diesel Fuel and 20,000 gallons of Kerosene per year. β Fugitives not included in total because source is not 1 of 28 and did not have a NSPS in affect on August 7, 1980.									

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of NO_x and CO are greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a Federally Enforceable State Operating Permit (FESOP) and New Source Review (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) Diesel Fuel fired equipment with horsepower greater than 600 shall comply with the following:
 - (A) No. 2 diesel fuel usage shall not exceed 20,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (B) NO_x emissions shall not exceed 0.445 pounds per gallon.
 - (C) CO emissions shall not exceed 0.118 pounds per gallon.
- (2) Diesel Fuel fired equipment with horsepower less than 600 shall comply with the following:

- (A) No. 2 diesel fuel usage shall not exceed 55,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (B) NO_x emissions shall not exceed 0.613 pounds per gallon.
 - (C) CO emissions shall not exceed 0.132 pounds per gallon.
- (3) Space heaters using kerosene shall comply with the following:
- (A) Kerosene usage shall not exceed 20,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (B) NO_x emissions shall not exceed 0.08 pounds per gallon.
 - (C) CO emissions shall not exceed 0.0002 pounds per gallon.

Compliance with these limits, combined with the potential to emit NO_x and CO from all other emission units at this source, shall limit the source-wide total potential to emit of NO_x and CO to less than 100 tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits).

- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year, however; the PTE of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a Federally Enforceable State Operating Permit (FESOP) and New Source Review (326 IAC 2-8), because the source will limit emissions of HAPs to less than the Title V major source threshold levels.

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

The Outside Paint Area, identified as 05, shall not exceed 24 tons of HAPs per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable.

- (c) PSD Minor Source

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit NO_x is limited to less than 250 tons per year and the potential to emit all other attainment regulated pollutants are less than 250 tons per year, and this source is 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 do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII (326 IAC 12), are not included in the permit, since the compression ignition ICE meets the definition of a nonroad engine as defined by 40 CFR 1068.30.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants for Shipbuilding and Ship Repair (Surface Coating) 40 CFR 63.780, Subpart II (326 IAC 20-26), are not included in the permit because the source is not a major source for HAPS.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.5880, Subpart MMMM (326 IAC 20-80), are not included in the permit, because the source is not a major source of HAPS.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Boat Manufacturing, 40 CFR 63.5680, Subpart VVVV (326 IAC 20-48), are not included in the permit, since the source does not build fiberglass boats or aluminum recreational boats.
- (f) The requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAPs) for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63.6580, Subpart ZZZZ (326 IAC 20-82), are not included in the permit, since the emission units do not meet the definition of a stationary reciprocating internal combustion engine as defined by 40 CFR 63.6585.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities (40 CFR 63, Subpart CCCCCC), are not included in the permit, because the source does not have any gasoline storage tanks.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, (40 CFR 63.11169, Subpart HHHHHH (6H)), are not included for this proposed revision, because the source does not perform paint stripping using paint strippers that contain methylene chloride (MeCl), performs autobody refinishing operations, or has spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63, Subpart XXXXXX (6X)), are not included for this proposed revision, because this source's SIC is not listed.
- (j) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (k) 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 less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HAPs is greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.
- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to 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 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) 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.
 - (2) 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.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
The source is subject to the requirements of 326 IAC 6-4, because the delivery of raw material has the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year.
- (h) 326 IAC 8-12 (Shipbuilding or Ship Repair Operations in Clark/Floyd/Lake/Porter Counties)
The source is not subject to 326 IAC 8-12, because the source is located in Perry County.

HPG/Oxygen Cutting Operations

- (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the cutting operations are exempt from the requirements of 326 IAC 6-3-2 because they each have potential particulate emissions less than five hundred fifty one thousandths (0.551) pound per hour.

Welding Operations

- (j) (326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the welding operations are exempt from the requirements of 326 IAC 6-3-2 because they each have potential particulate emissions less than five hundred fifty

one thousandths (0.551) pound per hour.

Outside Metal Paint Area

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

- (1) The outside metal paint area, identified as 05, does not use dip, roll, flow or brush coating exclusively and uses more than five (5) gallons of paint per day, therefore, 326 IAC 6-3-2 applies.
- (2) Pursuant to 326 IAC 6-3-2(d), particulate from the outside metal paint area, identified as 05, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. IDEM has made a determination that Tell City Boat Work's work practice standards are an equivalent control device. Therefore, the following work practice standards shall be followed when the outside metal paint area is in operation:
 - (A) Surface coating operations are to be completed in such a manner that all particulate matter (drift or over spray) remains on the source's property.
 - (B) Surface coating with high volume low pressure (HVLP) spray guns will be limited to times when the wind velocity is less than 10 mph.
 - (C) Surface coating of flat horizontal surfaces of vessels will be accomplished by rolling or brushing when practical.
 - (D) Coatings of inter compartments will be completed within enclosed spaces.
 - (E) Surface coating of small parts/fixtures to be attached to vessels will be coated in open areas that are shrouded if needed and is practical.

(l) 326 IAC 8-1-6 (New facilities; General Reduction Requirements)

Pursuant to 326 IAC 8-1-6(3)(A), the outside metal paint area, identified as 05, is exempt from the provisions of 326 IAC 8-1-6, because the outside metal paint area is regulated by 326 IAC 8-2-9.

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

The outside metal paint area, identified as 05, perform the coating of metal parts under the SIC classification code 3731 and has actual VOC emissions greater than fifteen (15) pounds per day before add on controls. Therefore, this source subject to this rule under 326 IAC 8-2-9(a)(5).

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere volatile organic compound (VOC) from application equipment of the outdoor paint area in excess of 3.5 pounds of VOC per gallon of coating less water delivered to a coating applicator that applies extreme performance coatings.

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from application equipment of the outdoor paint area 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 evaporation is minimized.

Compliance with the VOC content limit shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (C \times U) / \sum U]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied;

and U is the usage rate of the coating in gallons per day.

- (n) There are no other 326 IAC 8 Rules that are applicable to the outside metal paint area.

Fuel Consumption Operations

- (o) 326 IAC 8-4-6 (Gasoline Dispensing Facilities)
The source is not subject to the requirements of 326 IAC 8-4-6, because the source does not have gasoline storage tanks.
- (p) 326 IAC 9-1-1 (Carbon Monoxide Emission Limits)
This source is not subject to the requirements of 326 IAC 9-1-1, because the source is not one of the listed source categories in 326 IAC 9-1-2.
- (q) 326 IAC 10-1-1 (Nitrogen Oxides Control in Clark and Floyd Counties)
This source is not subject to the requirements of 326 IAC 10-1-1, because the source is not located in Clark or Floyd Counties.
- (r) 326 IAC 10-3-1 (Nitrogen Oxide Reduction Program for Specific Source Categories)
This source is not subject to the requirements of 326 IAC 10-3-1, because the source is not one of the listed source categories in 326 IAC 10-3-1(a).
- (s) 326 IAC 10-4-1 (Nitrogen Oxide Budget Trading Program)
This source is not subject to the requirements of 326 IAC 10-4-1, since the source does not operate generating units for electricity.
- (t) 326 IAC 10-5-1 (Nitrogen Oxide Program)
This source is not subject to the requirements of 326 IAC 10-5-1, since the source does not operate any large NOx SIP Call engines.

Grinding Operations

- (u) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(14), the grinding operations are exempt from the requirements of 326 IAC 6-3-2 because they each have potential particulate emissions less than five hundred fifty one thousandths (0.551) pounds per hour.

Conclusion and Recommendation

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 May 10, 2010.

The operation of this source shall be subject to the conditions of the attached proposed FESOP No. 123-29238-00026. The staff recommends to the Commissioner that this FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Bruce Farrar 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) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.

- (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

Appendix A: Emission Calculations

Company Name: Tell City Boat Works, Inc.
Address City IN Zip: 926 South Boundary St., Tell City, IN 47586
Permit Number: 123-29238-00026
Plt ID: 123-00026
Reviewer: Bruce Farrar
Date: May 10, 2010

Uncontrolled Potential to Emit (tons/year)							
	Cutting 02	Welding 03	Grinding 04	Outside Paint Area 05	Fuel Comsumption 06	Fugitives	Totals*
PM	1.79	0.95	5.62	19.79	32.75	10.33	60.90
PM10	1.79	0.95	5.62	19.79	31.93	2.63	60.08
PM2.5	1.79	0.95	5.62	19.79	31.93	2.63	60.08
SO2	-	-	-	-	84.10	-	84.10
NOX	-	-	-	-	500.20	-	500.20
VOC	-	-	-	39.35	37.17	-	76.52
CO	-	-	-	-	108.68	-	108.68
total HAPs	9.71E-06	0.53	-	27.69	4.10E-01	-	28.63
Single HAP name	3.53E-06 Chromium	0.52 Magnesium	-	8.01 Xylene	0.11 Benzene	-	

Limited Potential to Emit (tons/year)							
	Cutting 02	Welding 03	Grinding 04	Outside Paint Area 05	Fuel Comsumption 06	Fugitives	Totals*
PM	1.79	0.95	5.62	19.79	1.35	3.39	29.49
PM10	1.79	0.95	5.62	19.79	1.35	0.87	29.49
PM2.5	1.79	0.95	5.62	19.79	1.35	0.87	29.49
SO2	-	-	-	-	4.65	-	4.65
NOX	-	-	-	-	22.11	-	22.11
VOC	-	-	-	39.35	1.49	-	40.84
CO	-	-	-	-	4.81	-	4.81
total HAPs			<25				<25
Single HAP name	3.53E-06 Chromium	0.52 Magnesium	-	8.01 Xylene	0.11 Benzene		<10

* Fugitives not included in total because source is not 1 of 28 and did not have a NSPS in affect on August 7, 1980.

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads**

Company Name: Tell City Boat Works, Inc.
Address City IN Zip: 926 South Boundary St., Tell City, IN 47586
Permit Number: 123-29238-00026
Plt ID: 123-00026
Reviewer: Bruce Farrar
Date: May 10, 2010

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Tractor Trailer (plant steel delivery) (one-way trip)	1.16	2.0	2.3	37.7	87.5	1400.0	0.265	0.6	222.6
Straight Truck (10 wheels) (misc supplies) (one way trip)	1.0	0.8	0.8	27.0	21.6	1400.0	0.265	0.2	77.4
Service Truck (6 wheel)	1.0	4.0	8.0	20.0	160.0	1400	0.265	2.1	774.2
Automobiles (employees & visitors)	160.0	2.5	400.0	1.5	600.0	300	0.057	22.7	8295.5
Total			411.1		869.1			25.7	9369.7

Average Vehicle Weight Per Trip =

2.1

 tons/trip
 Average Miles Per Trip =

0.06

 miles/trip

Unmitigated Emission Factor, $E_f = k * [(s/12)^a] * [(W/3)^b]$ (Equation 1a from AP-42 13.2.2) 59.83
47.23

	PM	PM10	
where k =	4.9	1.5	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-3 Sand/Gravel Processing P)
a =	0.7	0.9	= constant (AP-42 Table 13.2.2-2)
W =	2.1	2.1	tons = average vehicle weight (provided by source)
b =	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [(365 - P)/365]$
 Mitigated Emission Factor, $E_{ext} = E * [(365 - P)/365]$
 where P =

125

 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	
Unmitigated Emission Factor, $E_f =$	2.20	0.56	lb/mile
Mitigated Emission Factor, $E_{ext} =$	1.45	0.37	lb/mile
Dust Control Efficiency =	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)
Tractor Trailer (plant steel delivery) (one-way trip)	0.25	0.06	0.16	0.04	0.08	0.02
Straight Truck (10 wheels) (misc supplies) (one way trip)	0.09	0.02	0.06	0.01	0.03	0.01
Service Truck (6 wheel)	0.85	0.22	0.56	0.14	0.28	0.07
Automobiles (employees & visitors)	9.14	2.33	6.01	1.53	3.01	0.77
	10.33	2.63	6.79	1.73	3.39	0.87

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PTE = Potential to Emit

Appendix A: Emissions Calculations
Thermal Cutting - Unlimited

Company Name: Tell City Boat Works, Inc.
Address City IN Zip: 926 South Boundary St., Tell City, IN 47586
Permit Number: 123-29238-00026
Pit ID: 123-00026
Reviewer: Bruce Farrar
Date: May 10, 2010

FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 0.5 inches thick)*				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
HPG/Oxygen	1	0.5	4.8	0.0028	8.40E-06	1.40E-06	5.60E-06	0.403	1.21E-06	2.02E-07	8.06E-07	2.22E-06
Plasma**	1	0.5	45	0.0039				0.005	0.000	0.000	0.000	0.00E+00
EMISSION TOTALS												
Potential Emissions lbs/hr								0.41	1.21E-06	2.02E-07	8.06E-07	2.22E-06
Potential Emissions lbs/day								9.80	2.90E-05	4.84E-06	1.94E-05	5.32E-05
Potential Emissions tons/year								1.79	5.30E-06	8.83E-07	3.53E-06	9.71E-06

METHODOLOGY

* Based on source calculation of an average of 0.5 inch steel plate thickness

**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 rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 0.5 in 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/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs

Appendix A: Emissions Calculations
Welding - Unlimited

Company Name: Tell City Boat Works, Inc.
Address City IN Zip: 926 South Boundary St., Tell City, IN 47586
Permit Number: 123-29238-00026
Pit ID: 123-00026
Reviewer: Bruce Farrar
Date: May 10, 2010

PROCESS	Electrode used (lbs/year)	EMISSION FACTORS*					EMISSIONS					Total HAPS (tons/year)	
		1.0 lb/1000lbs	1.0 lb/1000lbs				(tons/year)						
		PM = PM10	Mn	Ni	Cr	Co	PM = PM10	Mn	Ni	Cr	Co		
WELDING													
SMAW Procedure													
	30905108	35	16.4	1.38				0.000288	2.42E-05				2.42E-05
	30905128	2,633	25.6	9.91	0.04	0.03		0.033696	1.304E-02	5.27E-05	3.95E-05		1.31E-02
	30905132	176	38.4	9.98	0.05	0.05	0.01	0.003370	8.757E-04	4.39E-06	4.39E-06	8.78E-07	8.85E-04
	30905144	4,475	18.4	10.3	0.02	0.06		0.041172	2.305E-02	4.48E-05	1.34E-04		2.32E-02
	30905148	12,373	9.2	6.29		0.01		0.056915	3.891E-02	0.00E+00	6.19E-05		3.90E-02
	30905156	35	17.1	0.3	0.51	0.17		0.000300	5.265E-06	8.95E-06	2.98E-06		1.72E-05
	30905164	18	16.9	7.83	0.13	2.12		1.48E-04	6.871E-05	1.14E-06	1.86E-05		8.85E-05
GMWA Procedure													
	30905220	74	3.2	2.45	2.26	5.28		0.000118	9.029E-05	8.33E-05	1.95E-04		3.68E-04
	30905254	81	5.2	3.18	0.01	0.01	0.01	0.000210	1.284E-04	4.04E-07	4.04E-07	4.04E-07	1.30E-04
FCAW Procedures													
	30905300	3,071	12.2	6.62	0.04	0.02	0.01	0.018735	1.017E-02	6.14E-05	3.07E-05	1.54E-05	1.03E-02
	30905308	18	57	7.04	1.02	9.69		5.00E-04	6.18E-05	8.95E-06	8.50E-05	0.00E+00	1.56E-04
	30905312	1,376	9.1					0.006					
	30905320	2,236	8.5	5.9	0.93	9.7		0.010	6.60E-03	1.04E-03	1.08E-02	0.00E+00	1.85E-02
	30905354	20,656	15.1	8.91	0.05	0.04		0.156	9.20E-02	5.16E-04	4.13E-04	0.00E+00	9.30E-02
	30905355	163,742	12.2	6.62	0.04	0.02	0.01	0.999	0.542	0.003	1.64E-03	8.19E-04	5.48E-01
SAW Procedure													
	30905410	15479.1	0.05					3.87E-04					0.00E+00
Potential Emissions tons/year								1.33	0.73	5.10E-03	1.35E-02	8.35E-04	0.75
PTE of TCBW (tons/year) ^a								0.95	0.52	3.64E-03	9.619E-03	5.967E-04	0.11

*Emission Factors are from AP-42 table 12.19-1 (PM) and 12.19-2 (HAPS) by electrode type

a. PTE is based on Corn Island Shipyard (CIS) with a potential steel throughput of 14,000 tons per year, TCBW has a potential steel throughput of 2,000 tons per year.

METHODOLOGY

Welding emissions tons/year = Annual Usage (lbs) * emission factor (lbs pollutant/1000 lbs electrode)*(1/2000lbs)

PTE of TCBW = (PTE CIS) * (2,000/14,000)

**Appendix A: Emissions Calculations
Grinding Operations**

Company Name: Tell City Boat Works, Inc.
Address City IN Zip: 926 South Boundary St., Tell City, IN 47586
Permit Number: 123-29238-00026
Plt ID: 123-00026
Reviewer: Bruce Farrar
Date: May 10, 2010

Grinding wheels used:

2530
500

 4 1/2" Wheels
 7" Wheels

No. of 4 1/2" Wheels

2530

 x 1.7 lbs/wheel = 4301 lbs

No. of 7" Wheels

500

 x 4.2 lbs/wheel = 2100 lbs

TOTAL

6401

 lbs/2000

3.20

 tons

6401

 lbs/yr x 1/(96 hrs/week x 52 wks/yr) =

1.282

 lbs/hr

Potential metal removal by grinding =

1.282

 lbs/hr x 8760 hr/yr x 1 ton/2000 lbs =

5.62

 ton/yr
 TCBW PTE^a

4

Emission Factor based on manufacturer of 1.7 lbs of mild steel per 4.5 inch wheel and 4.2 lbs mild steel per 7 inch wheel. Worse case emissions would be if all metal removed by grinding was PM 10.

a. PTE is based on a similar operation (at Corn Island Shipyard (CIS) (Permit #147-27989-00047)) with a potential steel throughput of 14,000 tons per year, TCBW has a potential steel throughput of 10,000 tons per year.

METHODOLOGY

Particulate Emissions = (grinding wheel emission factor) * (annual wheel usage) * (1/2000 lbs)

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

**Company Name: Tell City Boat Works, Inc.
Address City IN Zip: 926 South Boundary St., Tell City, IN 47586
Permit Number: 123-29238-00026
Pit ID: 123-00026
Reviewer: Bruce Farrar
Date: May 10, 2010**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Hourly Usage	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
Epoxy - Universal HVS															
Americoat 240 Epoxy Resin	12.7	9.70%	0.0%	9.70%	0.0%	90.30%	1.40	1.23	1.23	1.72	41.39	7.55	3.52	1.36	95%
Amercoat 10 Thinner	7.01	100.00%	0.00%	0.00%	0.00%	0.00%	0.14	7.01	7.01	0.98	23.55	4.30	0.00		95%
Acrylic - Top Coat															
PSX 1001	9.5	31.90%	0.0%	31.90%	0.0%	68.10%	0.40	3.03	3.03	1.21	29.14	5.32	3.97	4.45	65%
Amercoat 8 Thinner	6.8	100.00%	0.0%	100.00%	0.0%	0.00%	0.04	6.80	6.80	0.27	6.54	1.19	0.00		65%
Primer - Inorganic Zink															
Dimecote 9 H Liquid	26.3	10.98%	0.9%	10.11%	2.8%	89.02%	0.40	2.73	2.66	1.16	27.72	5.06	2.05	2.99	95%
Americoat 65 Thinner	7.3	100.00%	0.0%	100.00%	0.0%	0.00%	0.04	7.26	7.26	0.29	6.97	1.27	0.00		95%
Primer - Reinf. Inorganic Zink															
Dimecote 302H Resin and Cure	19.1	12.46%	0.0%	12.46%	0.0%	87.54%	0.40	2.38	2.38	0.95	22.85	4.17	10.25	2.72	65%
Amercoat 10 Thinner	7.0	100.00%	0.0%	100.00%	0.0%	0.00%	0.04	7.01	7.01	0.28	6.73	1.23	0.00		65%
Cleaner/Thinner															
Amercoat12	6.9	100.00%	0.0%	100.00%	0.0%	0.00%	0.20	6.93	6.93	1.39	33.26	6.07	0.00		0%
Americoat 65 Thinner	7.3	100.00%	0.0%	100.00%	0.0%	0.00%	0.10	7.26	7.26	0.73	17.45	3.18	0.00		0%

State Potential Emissions**Add worst case coating to all solvents****8.98****215.61****39.35****19.79**

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)

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

**Company Name: Tell City Boat Works, Inc.
Address City IN Zip: 926 South Boundary St., Tell City, IN 47586
Permit Number: 123-29238-00026
Plt ID: 123-00026
Reviewer: Bruce Farrar
Date: May 10, 2010**

Material	Density (Lb/Gal)	Gallons of Material Hourly	Weight % Toluene	Weight % Xylene	Weight % Benzenes	Weight % MIBK	Weight % MEK	Weight % Methanol	Weight % Epichlorhydrin	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Benzenes Emissions (ton/yr)	MIBK Emissions (ton/yr)	MEK Emissions (ton/yr)	Methanol Emissions (ton/yr)	Epichlorhydrin Emissions (ton/yr)
Epoxy - Universal HVS																
Americoat 240 Epoxy Resin and Cure	12.7	1.40	0.00%	1.00%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00	0.78	0.00	0.00	0.00	0.00	7.79
Americoat 10 Thinner	7.01	0.14	60.00%	0.00%	0.00%	40.00%	0.00%	1.00%	0.00%	2.58	0.00	0.00	1.72	0.00	0.04	0.00
Acrylic - Top Coat																
PSX 1001	9.8	0.40	0.00%	18.00%	5.00%	0.00%	0.00%	1.00%	0.00%	0.00	3.08	0.85	0.00	0.00	0.17	0.00
Americoat 8 Thinner	7.3	0.04	0.00%	0.00%	0.00%	0.00%	90.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	1.16	0.00	0.00
Primer - Inorganic Zink																
Dimecote 9 H Liquid	26.3	0.40	0.00%	0.40%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.18	0.00	0.00	0.00	0.00	0.00
Americoat 65	7.3	0.04	1.00%	89.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.01	1.13	0.13	0.00	0.00	0.00	0.00
Primer - Reinf. Inorganic Zink																
Dimecote 302H Resin and Cure	19.1	0.40	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Americoat 10 Thinner	7.0	0.04	60.00%	0.00%	0.00%	40.00%	0.00%	0.00%	0.00%	0.74	0.00	0.00	0.49	0.00	0.00	0.00
Cleaner/Thinner																
Americoat12	6.93	0.20	60.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.65	0.00	0.00	0.00	0.00	0.00	0.00
Americoat 65	7.26	0.10	1.00%	89.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.03	2.83	0.32	0.00	0.00	0.00	0.00

Total State Potential Emissions 7.01 8.01 1.30 2.21 1.16 0.21 7.79

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal per hour * Weight % HAP * 8760 hours * 1 ton/2000 lbs

Total HAPS: 27.69

**Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines - Diesel Fuel
Output Rating (<=600 HP)**

Company Name: Tell City Boat Works, Inc.
Address City IN Zip: 926 South Boundary St., Tell City, IN 47586
Permit Number: 123-29238-00026
Plt ID: 123-00026
Reviewer: Bruce Farrar
Date: May 10, 2010

Emissions calculated based on output rating (hp)

Output Horsepower Rating (hp)	3200.0
Maximum Hours Operated per Year	8760
Potential Throughput (hp-hr/yr)	28,032,000

Emission Unit | Horse Power Rating

Crane, 102	300
Crane, 103	300
Crane, 104	275
Crane, 105	275
Gen./Welder	175
Manlift	200
Manlift	100
Forklift	200
Forklift	100
Tractor	100
Truck Tractor	500
Service Truck	225
Truck	225
Truck	225

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0022	0.0022	0.0022	0.0021	0.0310	0.0025	0.0067
Potential Emission in tons/yr	30.84	30.84	30.84	28.73	434.50	35.24	93.63

*PM and PM2.5 emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

Hazardous Air Pollutants (HAPs)

	Pollutant							
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein	Total PAH HAPs***
Emission Factor in lb/hp-hr****	6.53E-06	2.86E-06	2.00E-06	2.74E-07	8.26E-06	5.37E-06	6.48E-07	1.18E-06
Potential Emission in tons/yr	9.15E-02	4.01E-02	2.80E-02	3.84E-03	1.16E-01	7.53E-02	9.08E-03	1.65E-02

***PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter

****Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

Potential Emission of Total HAPs (tons/yr)	3.80E-01
---	-----------------

Methodology

Emission Factors are from AP42 (Supplement B 10/96), Tables 3.3-1 and 3.3-2

Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] * [Maximum Hours Operated per Year]

Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] * [Emission Factor (lb/hp-hr)] / [2,000 lb/ton]

Appendix A: Emission Calculations
Large Reciprocating Internal Combustion Engines - Diesel Fuel
Output Rating (>600 HP)

Company Name: Tell City Boat Works, Inc.
Address City IN Zip: 926 South Boundary St., Tell City, IN 47586
Permit Number: 123-29238-00026
Plt ID: 123-00026
Reviewer: Bruce Farrar
Date: May 10, 2010

Emissions calculated based on output rating (hp)

Output Horsepower Rating (hp)	625.0
Maximum Hours Operated per Year	8760
Potential Throughput (hp-hr/yr)	5,475,000
Sulfur Content (S) of Fuel (% by weight)	2.500

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	7.00E-04	4.01E-04	4.01E-04	2.02E-02 (.00809S)	2.40E-02 **see below	7.05E-04	5.50E-03
Potential Emission in tons/yr	1.92	1.10	1.10	55.37	65.70	1.93	15.06

*PM10 emission factor in lb/hp-hr was calculated using the emission factor in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

**NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr

Hazardous Air Pollutants (HAPs)

	Pollutant						
	Benzene	Toluene	Xylene	Formaldehyde	Acetaldehyde	Acrolein	Total PAH HAPs***
Emission Factor in lb/hp-hr****	5.43E-06	1.97E-06	1.35E-06	5.52E-07	1.76E-07	5.52E-08	1.48E-06
Potential Emission in tons/yr	1.49E-02	5.38E-03	3.70E-03	1.51E-03	4.83E-04	1.51E-04	4.06E-03

***PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter

****Emission factors in lb/hp-hr were calculated using emission factors in lb/MMBtu and a brake specific fuel consumption of 7,000 Btu / hp-hr (AP-42 Table 3.3-1).

Potential Emission of Total HAPs (tons/yr)	3.02E-02
---	-----------------

Methodology

Emission Factors are from AP 42 (Supplement B 10/96) Tables 3.4-1 , 3.4-2, 3.4-3, and 3.4-4

Potential Throughput (hp-hr/yr) = [Output Horsepower Rating (hp)] * [Maximum Hours Operated per Year]

Potential Emission (tons/yr) = [Potential Throughput (hp-hr/yr)] * [Emission Factor (lb/hp-hr)] / [2,000 lb/ton]

**Appendix A: Emission Calculations
Limited Annual Fuel Consumption**

**Company Name: Tell City Boat Works, Inc.
Address City IN Zip: 926 South Boundary St., Tell City, IN 47586
Permit Number: 123-29238-00026
Plt ID: 123-00026
Reviewer: Bruce Farrar
Date: May 10, 2010**

Product	HP Type	Annual Usage (Gal)	BTU/Gal	NOx Emission Factor ¹ lb/MMBtu	NOx Tons/Yr	CO Emission Factor ¹ lb/MMBtu	CO Tons/Yr	SOx Emission Factor ¹ lb/MMBtu	SOx Tons/Yr	PM-10 Emission Factor ¹ lb/MMBtu	PM-10 Tons/Yr	VOC Emission Factor ¹ lb/MMBtu	VOC Tons/Yr
# 2 DIESEL	>600 HP	20,000	139,000	3.2	4.45	0.85	1.182	1.51	2.099	0.01	0.014	0.09	0.125

Product	HP Type	Annual Usage (Gal)	BTU/Gal	NOx Emission Factor ² lb/MMBtu	NOx Tons/Yr	CO Emission Factor ² lb/MMBtu	CO Tons/Yr	SOx Emission Factor ² lb/MMBtu	SOx Tons/Yr	PM-10 Emission Factor ² lb/MMBtu	PM-10 Tons/Yr	VOC Emission Factor ² lb/MMBtu	VOC Tons/Yr
# 2 DIESEL	<600 HP	55,000	139,000	4.41	16.86	0.95	3.631	0.29	1.109	0.31	1.185	0.35	1.338

Product	HP Type	Annual Usage (Gal)	BTU/Gal	NOx Emission Factor ³ lb/MGal	NOx Tons/Yr	CO Emission Factor ³ lb/MGal	CO Tons/Yr	SOx Emission Factor ³ lb/MGal	SOx Tons/Yr	PM-10 Emission Factor ³ lb/MGal	PM-10 Tons/Yr	VOC Emission Factor ³ lb/MGal	VOC Tons/Yr
KEROSENE		20,000	135,000	80	0.80	0.2	0.002	144	1.440	15	0.150	3	0.030

TOTALS					22.11	4.81	4.81	4.65	4.65	1.35	1.35	1.49	1.49
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1 Emission Factors from AP-42, table 3.4-1

2 Emission Factors from AP-42, table 3.3-1

3 Emission Factors from Source

Source requested to limit Diesel Fuel to 75,000 gallons and Kerosene to 20,000 gallons per year

METHODOLGY

All other Emissions tons/yr = (gallons/yr * BTU/gal) * (emission factor (lbs)/MMBtu) * (1ton/2000 lbs)

NOx emissions lbs/gal = BTU/gal * NOx emission factor lbs/MMBtu * (1 MMBtu/10⁶ BTU)

CO emissions lbs/gal = BTU/gal * CO emission factor lbs/MMBtu * (1 MMBtu/10⁶ BTU)

NOx emissions tons/yr = (gallons/year) * (lbs/gallon) * 1/2000

CO emissions tons/yr = (gallons/year) * (lbs/gallon) * 1/2000



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

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

TO: Don Foertsch
Tell City Boat Works
POB 516
Tell City, Indiana 47586

DATE: September 8, 2010

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

SUBJECT: Final Decision
FESOP
123-29238-00026

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:
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.

Final Applicant Cover letter.dot 11/30/07



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September 8, 2010

TO: Tell City Public Library

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

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

Applicant Name: Tell City Boat Works, Inc.
Permit Number: 123-29238-00026

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

Mail Code 61-53

IDEM Staff	CDENNY 9/8/2010 Tell City Boat Works 123-29238-00026 (final)		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	Type of Mail: CERTIFICATE OF MAILING ONLY	

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		Don Foertsch Tell City Boat Works PO Box 516 Tell City IN 47586 (Source CAATS)										
2		Perry County Health Department Perry County Health Department Courthouse Annex Cannelton IN 47520-1251 (Health Department)										
3		Mr. Randy Brown Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party)										
4		Mr. Ron Hendrich Schwab Corporation 4630 E St Rd 66 Cannelton IN 47520 (Affected Party)										
5		Tell City - City Council and Mayors Office PO Box 515 Tell City IN 47586 (Local Official)										
6		Perry County Commissioners Court House, 2219 Payne Street Tell City IN 47586 (Local Official)										
7		Tell City Perry County Public Library 2328 Tell Street Tell City IN 47586-1717 (Library)										
8		Mr. Jim Morse Kentucky DEP - Air Permits 14 Reilly Road Frankfort, KY 40601 Frankfort KY 40601 (Affected State)										
9		Mr. Charles Bates PABCO Corp. PO Box 115 Santa Claus IN 47579 (Consultant)										
10		Mr. John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
11		Ohio Valley Gas Corporation 710 7th Street Tell City IN 47586 (Affected Party)										
12		Marjorie E. Fenn 2 11th Street Tell City IN 47586 (Affected Party)										
13		Bert & Mary Fenn P.O. Box 157 Tell City IN 47586 (Affected Party)										
14		Donna Ramsey 1321 Long Fellow Drive Clarksville IN 47129 (Affected Party)										
15		Tim Rader 10 10th Street Tell City IN 47586 (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 mail merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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1		Donnie & Flora 1211 Rubens Street Tell City IN 47586 (Affected Party)										
2		Tracy Pearson 12 10th Street Tell City IN 47586 (Affected Party)										
3		Kirt T. Cecil 342 12th Street Tell City IN 47586 (Affected Party)										
4		Heather Badger 16 10th Street Tell City IN 47586 (Affected Party)										
5		Carla M. Harlem 20 10th Street Tell City IN 47586 (Affected Party)										
6		Glen R. Swaney 23 10th Street Tell City IN 47586 (Affected Party)										
7		Diana Simpson 23 10th Street Tell City IN 47586 (Affected Party)										
8		Marilyn Cail 23 10th Street Tell City IN 47586 (Affected Party)										
9		Carolyn Gilliland 23 10th Street Tell City IN 47586 (Affected Party)										
10		Peggy L. Foster 37 10th Street Tell City IN 47586 (Affected Party)										
11		Chirley & Charlotte Cronin P.O. Box 511 Tell City IN 47586 (Affected Party)										
12		Steven Cronin 32 9th Street Tell City IN 47586 (Affected Party)										
13		Margaret S. & Michael W. Morris 10 River Road Tell City IN 47586 (Affected Party)										
14		Rebecca E. Apling 10 River Road Tell City IN 47586 (Affected Party)										
15		Stephen W. Morris 10 River Road Tell City IN 47586 (Affected Party)										

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1		Paula c/o Michael W. Morris 10 River Road Tell City IN 47586 (Affected Party)										
2		Richey Morris c/o Michael W. Morris 10 River Road Tell City IN 47586 (Affected Party)										
3		Thomas Morris 10 River Road Tell City IN 47586 (Affected Party)										
4		Lawrence A. & Floretta S. Beatty 8 River Road Tell City IN 47586 (Affected Party)										
5		Authur & Barbara Huff 19 9th Street Tell City IN 47586 (Affected Party)										
6		Joe Mullen 4775 Boyd Road Tell City IN 47586 (Affected Party)										
7		Shannan Branham 21 9th Street Tell City IN 47586 (Affected Party)										
8		Dorothy Hinton 31 9th Street Tell City IN 47586 (Affected Party)										
9		Roger Moore 33 9th Street Tell City IN 47586 (Affected Party)										
10		Duane Allen Davis 36 9th Street Tell City IN 47586 (Affected Party)										
11		Wayne A. Leistner 34 9th Street Tell City IN 47586 (Affected Party)										
12		Ramsey Real Estate Enterprise 804 7th Street Tell City IN 47586 (Affected Party)										
13		Randy Stallings 42 9th Street Tell City IN 47586 (Affected Party)										
14		Michael Burst 25 10th Street Tell City IN 47586 (Affected Party)										
15		Pete & Pamela Franzman 1 11th Street Tell City IN 47586 (Affected Party)										

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											Remarks
1		Danial & Melissa 2301 Valparaiso Street Valparaiso IN 46383 (Affected Party)									
2		William I. & Dianna E. Rudolph 7 11th Street Tell City IN 47586 (Affected Party)									
3		Ralph & Ann Werner 27 11th Street Tell City IN 47586 (Affected Party)									
4		Texas Gas Transmission Corporation P.O. Box 20008 Owensboro KY 42304 (Affected Party)									
5		Hoosier Southern Railroad 926 S. Boundary Way Tell City IN 47586 (Affected Party)									
6		Mark R. Ramsey 712 Jefferson Street Tell City IN 47586 (Affected Party)									
7		Perry County Port Authority 926 S. Boundary Way Tell City IN 47586 (Affected Party)									
8											
9											
10											
11											
12											
13											
14											
15											

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