



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: December 5, 2011

RE: Jeffboat, LLC / 019-29304-00006

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, 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 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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.



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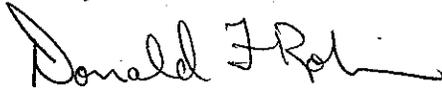
**Part 70 Operating Permit Renewal  
OFFICE OF AIR QUALITY**

**Jeffboat, LLC  
1030 E Market Street  
Jeffersonville, Indiana 47130**

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

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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 2-7 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.

Operation Permit No.: T019-29304-00006	
Issued by:  Donald F. Robin, P.E., Section Chief Permits Branch Office of Air Quality	Issuance Date: December 5, 2011  Expiration Date: December 5, 2016

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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 2-7-4(c)] [326 IAC 2-7-5(14)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary ship building and repair facility.

Source Address:	1030 East Market Street, Jeffersonville, Indiana 47130
General Source Phone Number:	(812) 288-1640
SIC Code:	3731
County Location:	Clark
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Nonattainment NSR Rules Major Source, under Section 112 of the Clean Air Act Not in 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]

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

- (a) Indoor shot blasting operations, identified as EU-01, with a maximum capacity of 600 marine vessels per year, consisting of:
  - (1) One (1) shot blast unit, known as Pangborn (No. 1), constructed in 1980, with a maximum airflow of 13,000 acfm, using steel shot, and exhausting to a baghouse dust collector identified as BH1.
  - (2) One (1) shot blast unit, known as Wheelabrator (No. 2), constructed in 1970, with a maximum airflow of 12,000 acfm, using steel shot, and exhausting to a baghouse dust collector identified as BH2.
- (b) Surface coating operations consisting of the following:
  - (1) Two (2) spray booths, identified as EU-02, for the application of weld-through (shop) primer when performing shipbuilding, with a maximum capacity of 600 marine vessels per year, with emissions controlled by paint arrestor pads, identified as PA1 and PA2. Unit No. 1 was constructed in 1980. Unit No. 2 was constructed in 1970. Under 40 CFR 63, Subpart II, this is considered shipbuilding and repair.
  - (2) Outdoor spray operations, identified as EU-03, constructed in 1939, consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications, with a maximum capacity of 600 marine vessels per year. A portion of the outdoor spray operations are conducted under cover that was installed in 2006. Under 40 CFR 63, Subpart II, this is considered shipbuilding and repair.

- (c) Welding operations, identified as EU-04, occurring outside and under a structure, for the construction of marine vessels from sheet steel, constructed in 1939, with a maximum capacity of 600 marine vessels per year, and with emissions uncontrolled and exhausted to the atmosphere.
- (d) Flame and plasma cutting operations, identified as EU-05, occurring outside and under a structure, for the construction of marine vessels from sheet steel, with flame cutting operations installed in 1939 and plasma cutting operations installed in 1990, with a maximum capacity of 600 marine vessels per year, and with emissions uncontrolled and exhausted to the atmosphere.
- (e) Four (4) abrasive outdoor blasting units for the outdoor maintenance and construction of marine vessels, identified as EU-06, constructed in 2002, with a maximum capacity of 2.0 tons of blast media per hour, and with emissions controlled by a dust suppressant and exhausted to the atmosphere.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(14)]

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

- (a) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]  
[326 IAC 6-5]
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including the following:
  - (1) Two (2) natural gas fired water-dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
  - (2) Two (2) natural gas fired pre-dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
  - (3) Two (2) natural gas fired dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
  - (4) Two (2) natural gas fired furnaces, with a maximum heat input capacity of 3.0 MMBtu/hr. [326 IAC 6.5-1]
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. [326 IAC 8-4-6]
- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5] [326 IAC 8-3-8]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

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

### B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

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- (a) This permit, T019-29304-00006, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

### B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

### B.5 Severability [326 IAC 2-7-5(5)]

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

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
  - (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and
  - (2) 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) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (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 2-7-5(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (12)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

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- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

- (c) 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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 Southeast 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  
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

- (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 2-7-5(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-4(c)(8) 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 2-7 and any other applicable rules.
- (g) 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.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
  - (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
  - (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T019-29304-00006 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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 2-7-4. 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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 2-7 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 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) 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 preconstruction approval required by 326 IAC 2-7-10.5 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 2-7-20(b) or (c). 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 2-7-20(b)(1) and (c)(1).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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 Part 70 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 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 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 substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22** Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.23** Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

**B.24** Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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 2-7-5(1)]

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

#### C.2 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.3 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.4 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). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.5 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. The provisions of 326 IAC 6-5 are not federally enforceable.

#### C.6 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

### Testing Requirements [326 IAC 2-7-6(1)]

#### C.7 Performance Testing [326 IAC 3-6]

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- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.8 Compliance Requirements [326 IAC 2-1.1-11]

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

### Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

#### C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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

**Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]**

**C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

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

**C.12 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]**

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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.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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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 a reasonable response step(s) 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 a reasonable response step(s) shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response step(s) taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]  
Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]  
(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 2-7-5(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 step(s) 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). 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) 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**

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

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(14)]:

- (a) Indoor shot blasting operations, identified as EU-01, with a maximum capacity of 600 marine vessels per year, consisting of:
- (1) One (1) shot blast unit, known as Pangborn (No. 1), constructed in 1980, with a maximum airflow of 13,000 acfm, using steel shot, and exhausting to a baghouse dust collector identified as BH1.
  - (2) One (1) shot blast unit, known as Wheelabrator (No. 2), constructed in 1970, with a maximum airflow of 12,000 acfm, using steel shot, and exhausting to a baghouse dust collector identified as BH2.

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the Pangborn (No. 1) and Wheelabrator (No. 2) shot blast units (EU-01) shall be limited to 0.03 grain per dry standard cubic foot of exhaust air each.

#### D.1.2 PSD and Nonattainment NSR Minor Limits [326 IAC 2-2] [326 IAC 2-1.1-5]

In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the Permittee shall comply with the following emission limitations:

PM, PM10, and PM2.5 emissions from the indoor blasting operations (EU-01) shall be less than the values in the following table:

Emission Unit	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
EU-01: Pangborn (No. 1)	9.06	9.06	9.06
EU-01: Wheelabrator (No. 2)	9.06	9.06	9.06

Compliance with the above limits, combined with the limits in Condition D.2.2 and the potential to emit PM, PM10, and PM2.5 from other units at this source, shall limit the potential to emit of PM and PM10 from the entire source to less than two hundred and fifty (250) tons per twelve (12) consecutive month period each and shall limit the potential to emit PM2.5 from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period and render the requirements of PSD (326 IAC 2-2) and Nonattainment NSR (326 IAC 2-1.1-5) not applicable to the source.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these units and any control devices. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

## Compliance Determination Requirements

### D.1.4 Particulate Control

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- (a) In order to ensure compliance with Conditions D.1.1 and D.1.2, the baghouse dust collectors identified as BH1 and BH2 shall be in operation and control emissions from the Pangborn (No. 1) and Wheelabrator (No. 2) shot blast units at all times the shot blast units are in operation.
- (b) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (c) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

## Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

### D.1.5 Visible Emissions Notations [40 CFR 64]

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- (a) Daily visible emission notations of the exhaust from baghouses BH1 and BH2, controlling emissions from the Pangborn (No. 1) and Wheelabrator (No. 2) shot blast units shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response step(s). Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response step(s) required by this condition. Failure to take a response step(s) shall be considered a deviation from this permit.

### D.1.6 Parametric Monitoring [40 CFR 64]

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The Permittee shall record the pressure drop across the baghouse BH1 used in conjunction with the Pangborn (No. 1) shot blast unit at least once per day when the Pangborn (No. 1) shot blast unit is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 7.0 inches of water or a range established during the latest stack test, the Permittee shall take a reasonable response step(s). Section C – Response to

Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response step(s) required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take a response step(s) shall be considered a deviation from this permit.

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

#### D.1.7 Baghouse Inspections

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An inspection shall be performed each calendar quarter of all bags controlling the Wheelabrator (No. 2) shot blast unit. All defective bags shall be replaced.

#### D.1.8 Broken or Failed Bag Detection - Multi-Compartment Baghouse [40 CFR 64]

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In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### D.1.9 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain daily records of the visible emission notations of the exhaust from baghouses BH1 and BH2. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (e.g. the process did not operate that day).
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain daily records of the pressure drop across the baghouse, BH1, controlling emissions from the Pangborn (No. 1) shot blast unit. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).
- (c) To document the compliance status with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

## SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:
(b) Surface coating operations consisting of the following:
(1) Two (2) spray booths, identified as EU-02, for the application of weld-through (shop) primer when performing shipbuilding, with a maximum capacity of 600 marine vessels per year, with emissions controlled by paint arrestor pads, identified as PA1 and PA2. Unit No. 1 was constructed in 1980. Unit No. 2 was constructed in 1970. Under 40 CFR 63, Subpart II, this is considered shipbuilding and repair.
(2) Outdoor spray operations, identified as EU-03, constructed in 1939, consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications, with a maximum capacity of 600 marine vessels per year. A portion of the outdoor spray operations are conducted under cover that was installed in 2006. Under 40 CFR 63, Subpart II, this is considered shipbuilding and repair.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the spray booths (EU-02) shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

#### D.2.2 PSD and Nonattainment NSR Minor Limits [326 IAC 2-2] [326 IAC 2-1.1-5]

In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the Permittee shall comply with the following emission limitations:

Emission Unit	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
EU-02: Spray Booth No. 1	2.28	2.28	2.28
EU-02: Spray Booth No. 2	2.28	2.28	2.28

Compliance with the above limits, combined with the limits in Condition D.1.2 and the potential to emit from other units at this source, shall limit the potential to emit of PM and PM10 from the entire source to less than two hundred fifty (250) tons per twelve (12) consecutive month period each and the potential to emit of PM 2.5 from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period and render the requirements of PSD (326 IAC 2-2) and Nonattainment NSR (326 IAC 2-1.1-5) not applicable to the source.

#### D.2.3 Particulate [326 IAC 6-3] [326 IAC 6-5]

Pursuant to 326 IAC 6-3-2(d) (Particulate Matter Emission Limitations for Manufacturing Processes), particulate from the outside spray operations (EU-03) shall be controlled by the following work practice standards:

- (a) Surface coating operations shall be conducted in such a manner that all particulate matter (drift or over spray) remains on the source's property.
- (b) Surface coating with spray application shall be limited to times when the wind velocity and direction does not cause overspray to cross the property line.
- (c) Surface coating with spray application shall be conducted with the use of containment

methods such as curtains or shrouds where practical and possible.

- (d) Surface coating of flat horizontal surfaces of vessels shall be accomplished by rolling or brushing when practical.

Compliance with the above work practice standards shall also satisfy compliance with 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations).

#### D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-12-4]

Pursuant to 326 IAC 8-12-4(a) (Shipbuilding or ship repair operations in Clark, Floyd, Lake, or Porter counties), VOC emissions from the No. 1 and No. 2 spray booths (EU-02) and the outdoor surface coating operations (EU-03) shall be limited as follows:

- (a) During application of specialty coatings, VOC emissions shall be limited throughout the year as follows:
  - (1) Special marking coatings shall not exceed a VOC content of four and eight-hundredths (4.08) pounds per gallon.
  - (2) Heat resistant and high-gloss coatings shall not exceed a VOC content of three and fifty-hundredths (3.50) pounds per gallon.
  - (3) High-temperature coatings shall not exceed a VOC content of four and seventeen-hundredths (4.17) pounds per gallon.
  - (4) Any other specialty coating shall not exceed a VOC content of two and eighty-three hundredths (2.83) pounds per gallon.
- (b) During application of any general use coating, VOC emissions shall be limited as follows:
  - (1) The VOC content of any general use coating shall not exceed two and eighty-three hundredths (2.83) pounds per gallon, as applied.
  - (2) From May 1 through September 30, no thinner shall be added to any general use coating.
- (c) During application of any weld-through (shop) preconstruction primer, VOC emissions shall be limited throughout the year as follows:
  - (1) Waterbased weld-through (shop) preconstruction primer shall be used.
  - (2) The VOC content of weld-through (shop) preconstruction primer, as applied, shall not exceed zero (0).
  - (3) No VOC containing cleaning material shall be used in the primer application facility.
  - (4) No VOC containing thinner shall be added to the weld-through (shop) preconstruction primer.
- (d) If the Permittee determines that a waterbased weld-through (shop) preconstruction primer can no longer be used due to an operational, performance, or availability constraint associated with the waterbased weld-through (shop) preconstruction primer, the Permittee shall do the following:

- (1) Notify the department within seven (7) days of discontinuing use of the waterbased weld-through (shop) preconstruction primer.
  - (2) Submit to the department for approval a plan for an alternative control within sixty (60) days of discontinuance. The alternative control shall consist of one (1) of the following:
    - (A) A waterbased weld-through (shop) preconstruction primer.
    - (B) A control system with a minimum overall VOC emissions reduction efficiency of ninety-five percent (95%) that is subject to each of the following requirements:
      - (i) The operation, maintenance, and testing requirements of 326 IAC 8-7-9.
      - (ii) The monitoring, record keeping, and reporting requirements of 326 IAC 8-7-10.
  - (3) Install the alternative control within nine (9) months of approval by the department of the plan required in D.2.5(d)(2).
- (e) During the time between the date when the Permittee discontinues the use of the waterbased preconstruction primer and the date when the alternative control is installed, the weld-through (shop) preconstruction primer used by the Permittee shall not exceed a VOC content of five and sixty-five hundredths (5.65) pounds per gallon or the VOC content for weld-through (shop) preconstruction primer prescribed by the U.S. EPA in 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating), whichever is lower.

#### D.2.5 Work Practice Standards [326 IAC 8-12-4]

Pursuant to 326 IAC 8-12-4(b), the Permittee shall comply with the following work practice standards:

- (a) Cleaning accessories, such as, but not limited to, paper, cloth, and rags that have been used for cleaning surfaces and equipment and that contain cleaning materials shall be stored in normally closed gasket sealed containers.
- (b) VOC-containing solvents and coatings shall be stored in normally closed sealed containers prior to use. Spent VOC-containing solvents and coatings shall be stored in normally closed gasket sealed containers.
- (c) Cleaning materials for cleaning spray equipment, including paint lines, shall not be used unless the equipment for collecting the cleaning materials and minimizing its evaporation to the atmosphere is used.
- (d) All handling and transfer of VOC-containing materials to and from containers, tanks, vats, drums, and piping systems shall be conducted in a manner that minimizes drips and spills, and any drips and spills shall be cleaned up promptly.
- (e) All containers, tanks, vats, drums, and piping systems shall be free of cracks, holes and other defects and must be closed unless materials are being added to or removed from them.

#### D.2.6 Training Requirements [326 IAC 8-12-4]

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Pursuant to 326 IAC 8-12-4(c), the Permittee shall comply with the following training requirements:

- (a) The training program may include training provided by the manufacturer or supplier of coatings, cleaning materials, or the application equipment thereof, and shall include written procedures, hands-on demonstration, as appropriate, and certification by the trainer of the trainee's ability to perform the task, on the following activities:
  - (1) Identification of appropriate coatings or cleaning materials.
  - (2) Preparation of coatings or cleaning materials according to coating or cleaning material manufacturer, distributor, or owner or operator's recommendations.
  - (3) Application of coatings or cleaning materials, or organic solvents using techniques that minimize their usage.
  - (4) Procedures to clean spray guns to minimize evaporation of organic solvents to the atmosphere.
  - (5) Work practice standards established in 326 IAC 8-12-4(b).
  - (6) Procedures to gather, record, monitor, and report data in accordance with 40 CFR 63.787 and 40 CFR 63.788.
- (b) The Permittee shall provide annual refresher training prior to May 1 to any worker performing one (1) or more of the activities listed in 326 IAC 8-12-4(c)(3). Such training shall be appropriate to the job responsibilities of the worker.
- (c) Any worker may perform one (1) or more activities listed in 326 IAC 8-12-4(c)(3), for not more than one hundred eighty (180) days, notwithstanding the requirement of 326 IAC 8-12-4(c)(2), provided:
  - (1) such untrained worker works under the supervision of a worker who meets the training requirements of 326 IAC 8-12-4(c)(2); and
  - (2) the Permittee keeps records of:
    - (A) The date the worker was assigned to the activity;
    - (B) The date training was completed; and
    - (C) The name of the worker providing the supervision.

#### D.2.7 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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A Preventive Maintenance Plan is required for these units and any control devices. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the plan required by this condition.

### **Compliance Determination Requirements**

#### D.2.8 Volatile Organic Compounds (VOC) [326 IAC 8-12-5]

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Pursuant to 326 IAC 8-12-5, the paint booths (EU-02) and the outdoor spray operation (EU-03) shall determine compliance using the methods in 40 CFR 63.786, as incorporated by reference in 326 IAC 20-26, in lieu of 326 IAC 8-12-5.

#### D.2.9 Particulate Control

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In order to ensure compliance with Conditions D.2.1 and D.2.2, the paint arrestor pads for particulate control, identified as PA1 and PA2, shall be in operation and control emissions from the two (2) paint booths (EU-02) at all times that the paint booths are in operation.

#### D.2.10 Wind Velocity

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In order to comply with Condition D.2.3(b), the Permittee shall determine the wind velocity and direction before the start of outdoor surface coating operations using spray application (EU-03).

- (a) If the Permittee determines that the wind velocity and/or direction could lead to overspray emissions that cross property boundaries, outdoor surface coating operations using spray application shall not commence until such time that favorable wind conditions prevail.
- (b) If, after commencing outdoor surface coating operations using spray application, changes in the wind velocity and/or direction occurs and will cause overspray to cross the property boundaries, all outdoor surface coating using spray application shall cease operation until such time that favorable wind conditions prevail.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR Part 64]**

#### D.2.11 Monitoring [40 CFR 64]

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- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the paint arrestor pads for the paint booths (EU-02). To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stack(s) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take a reasonable response step(s). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response step(s) required by this condition. Failure to take a response step(s) shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response step(s). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response step(s) required by this condition. Failure to take a response step(s) shall be considered a deviation from this permit.

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

#### D.2.12 Record Keeping Requirements

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- (a) Pursuant to 326 IAC 8-12-7, sources subject to 326 IAC 8-12 and 326 IAC 20-26 shall comply with the record keeping and reporting requirements of 40 CFR 63.786, as incorporated by reference in 326 IAC 20-26, in lieu of 326 IAC 8-12-7.
- (b) To document the compliance status with Conditions D.2.3(b) and D.2.10, the Permittee shall maintain a log of wind velocity and wind direction readings.
- (c) To document the compliance status with Condition D.2.11, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections. The Permittee shall include in its daily record when an observation is not taken and the reason for the lack of observation, (e.g. the process did not operate that day).

- (d) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.2.13 Record Keeping Requirements - Fugitive Control Measures [326 IAC 6-5]

Pursuant to 326 IAC 6-5-5(b), records shall be kept and maintained which document all control measures and activities to be implemented in accordance with Condition D.2.3. Said records shall be available upon the request of the commissioner, and shall be retained for three (3) years.

### SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

- (c) Welding operations, identified as EU-04, occurring outside and under a structure, for the construction of marine vessels from sheet steel, constructed in 1939, with a maximum capacity of 600 marine vessels per year, and with emissions uncontrolled and exhausted to the atmosphere.
- (d) Flame and plasma cutting operations, identified as EU-05, occurring outside and under a structure, for the construction of marine vessels from sheet steel, with flame cutting operations installed in 1939 and plasma cutting operations installed in 1990, with a maximum capacity of 600 marine vessels per year and, with emissions uncontrolled and exhausted to the atmosphere.
- (e) Four (4) abrasive outdoor blasting units for the outdoor maintenance and construction of marine vessels, identified as EU-06, constructed in 2002, with a maximum capacity of 2.0 tons of blast media per hour, and with emissions controlled by a dust suppressant and exhausted to the atmosphere.

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

Pursuant to 326 IAC 6-3-2 (Particulate Emissions for Manufacturing Processes), the allowable particulate emission rate from the welding operations (EU-04), the flame and plasma cutting operations (EU-05), and the outdoor abrasive blasting units (EU-06) shall each not exceed 32.78 pounds per hour when operating at a maximum process weight rate of 22.26 tons per hour.

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

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

$$E = 4.10 P^{0.67}$$

Where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.3.2 Fugitive Particulate Matter [326 IAC 6-5]

Pursuant to 326 IAC 6-5, the Permittee shall employ the following measures to control fugitive particulate matter emissions from the welding operations (EU-04), the flame and plasma cutting operations (EU-05), and the outdoor abrasive blasting operations (EU-06):

- (a) Welding Operations (EU-04):
  - (1) Welding operations shall be conducted in such a manner that all particulate matter remains on the source's property.
  - (2) Welding operations shall be conducted with the use of containment methods such as curtains or shrouds where practical and possible.
  - (3) The surfaces to be welded shall be kept clean of oils and grease.

- (4) Welding shall be conducted using the lowest recommended current and voltage that will provide quality welds.
  - (5) Cleanup from welding operations shall be performed through wet cleaning methods or vacuums equipped with appropriate filters.
  - (6) Welders shall be trained on operating techniques and procedures to reduce welding fumes and fugitive emissions.
- (b) Flame and Plasma Cutting Operations (EU-05):
- (1) Cutting operations shall be conducted in such a manner that all particulate matter remains on the source's property.
  - (2) Cutting operations shall be conducted with the use of containment methods such as curtains or shrouds where practical and possible.
  - (3) The surfaces to be cut shall be kept clean of oils and grease.
  - (4) Cutting shall be conducted using lower recommended cutting speeds to minimize emissions.
  - (5) Cleanup from cutting operations shall be performed through wet cleaning methods or vacuums equipped with appropriate filters.
  - (6) Cutting operators shall be trained on operating techniques and procedures to reduce fugitive emissions from cutting operations.
- (c) Outdoor Abrasive Blasting Operations (EU-06):
- (1) Outdoor abrasive blasting operations shall be conducted in such a manner that all particulate matter remains on the source's property.
  - (2) Outdoor abrasive blasting operations shall be conducted with the use of containment methods such as curtains or shrouds where practical and possible.
  - (3) The use of a dust suppressant additive or water injection shall be employed whenever the outdoor abrasive blasting units are in operation.
  - (4) Blast media shall be stored in a manner to prevent it from escaping into the atmosphere via wind erosion.
  - (5) Cleanup from outdoor abrasive blasting operations shall be performed through wet cleaning methods or vacuums equipped with appropriate filters.
  - (6) Outdoor abrasive blasting operators shall be trained on operating techniques and procedures to reduce fugitive emissions from outdoor abrasive blasting operations.

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

#### **D.3.3 Record Keeping Requirements - Fugitive Control Measures [326 IAC 6-5]**

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Pursuant to 326 IAC 6-5-5(b), records shall be kept and maintained which document all control measures and activities to be implemented in accordance with Condition D.3.2. Said records shall be available upon the request of the commissioner, and shall be retained for three (3) years.

## SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

Insignificant Activities:

- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including the following:
- (1) Two (2) natural gas fired water-dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
  - (2) Two (2) natural gas fired pre-dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
  - (3) Two (2) natural gas fired dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
  - (4) Two (2) natural gas fired furnaces, with a maximum heat input capacity of 3.0 MMBtu/hr. [326 IAC 6.5-1]

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.4.1 Particulate [326 IAC 6.5-1-2]

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Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the two (2) natural gas fired furnaces, the two (2) natural gas fired water-dry ovens, the two (2) natural gas fired pre-dry ovens, and the two (2) natural gas fired dry ovens shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf) of natural gas burned each.

## SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

Insignificant Activities:

- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. [326 IAC 8-4-6]

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.5.1 Gasoline Dispensing Facilities [326 IAC 8-4-6]

Pursuant to 326 IAC 8-4-6(b), the Stage I vapor recovery system requirements at the gasoline dispensing facility are as follows:

- (a) No owner or operator of a gasoline dispensing facility shall allow the transfer of gasoline between any transport and any storage tank unless the tank is equipped with the following:
- (1) A submerged fill pipe that extends to not more than:
    - (A) twelve (12) inches from the bottom of the storage tank if the fill pipe was installed on or before November 9, 2006; or
    - (B) six (6) inches from the bottom of the storage tank if the fill pipe was installed after November 9, 2006.
  - (2) Either a pressure relief valve set to release at not less than seven-tenths (0.7) pounds per square inch or an orifice of five-tenths (0.5) inch in diameter.
  - (3) A vapor balance system connected between the tank and the transport, operating according to manufacturer's specifications.
- (b) If the owner or employees of the owner of a gasoline dispensing facility are not present during loading, it shall be the responsibility of the owner or the operator of the transport to make certain the vapor balance system is:
- (1) connected between the transport and the storage tank; and
  - (2) operating according to manufacturer's specifications.

## SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

Insignificant Activities:

- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5] [326 IAC 8-3-8]

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements; and
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.6.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at

thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

#### D.6.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaning Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

#### D.6.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.6.3, the Permittee shall maintain the following records for each purchase of solvent. These records shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
  - (1) The name and address of the solvent supplier.

- (2) The date of purchase.
  - (3) The type of solvent.
  - (4) The volume of each unit of solvent.
  - (5) The total volume of the solvent.
  - (6) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

## SECTION E.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

- (b) Surface coating operations consisting of the following:
- (1) Two (2) spray booths, identified as EU-02, for the application of weld-through (shop) primer when performing shipbuilding, with a maximum capacity of 600 marine vessels per year with emissions controlled by paint arrestor pads, identified as PA1 and PA2. Unit No. 1 was constructed in 1980. Unit No. 2 was constructed in 1970. Under 40 CFR 63, Subpart II, this is considered shipbuilding and repair.
  - (2) Outdoor spray operations, identified as EU-03, constructed in 1939, consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications, with a maximum capacity of 600 marine vessels per year. A portion of the outdoor spray operations are conducted under cover that was installed in 2006. Under 40 CFR 63, Subpart II, this is considered shipbuilding and repair.

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

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

#### E.1.1 General Provisions Relating to NESHAP II [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

Pursuant to 40 CFR 63.780, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 1 of 40 CFR 63, Subpart II in accordance with the schedule in 40 CFR 63, Subpart II.

#### E.1.2 Shipbuilding and Ship Repair (Surface Coating) NESHAP [40 CFR 63, Subpart II][326 IAC 20-26]

The Permittee which engages in shipbuilding and ship repair is subject to the following provisions of 40 CFR 63, Subpart II, which is incorporated by reference as 326 IAC 20-26-1 (included as Attachment B of the permit):

- (1) 40 CFR 63.780;
- (2) 40 CFR 63.781(a)-(c);
- (3) 40 CFR 63.782;
- (4) 40 CFR 63.783;
- (5) 40 CFR 63.784(a);
- (6) 40 CFR 63.785;
- (7) 40 CFR 63.786(a)-(d);
- (8) 40 CFR 63.787;
- (9) 40 CFR 63.788(a), (b)(1)-(b)(4), (c);
- (10) 40 CFR 63.789;
- (11) Table 1 to Subpart II of 40 CFR 63;
- (12) Table 2 to Subpart II of 40 CFR 63;
- (13) Table 3 to Subpart II of 40 CFR 63.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Jeffboat, LLC  
Source Address: 1030 E Market Street, Jeffersonville, Indiana 47130  
Part 70 Permit No.: T019-29304-00006

**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:

Phone:

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**

**PART 70 OPERATING PERMIT**  
**EMERGENCY OCCURRENCE REPORT**

Source Name: Jeffboat, LLC  
Source Address: 1030 E Market Street, Jeffersonville, Indiana 47130  
Part 70 Permit No.: T019-29304-00006

**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
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response step(s) 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  
 PART 70 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Jeffboat, LLC  
 Source Address: 1030 E Market Street, Jeffersonville, Indiana 47130  
 Part 70 Permit No.: T019-29304-00006

**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 step(s) taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement (specify permit condition #)</b>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Step(s) Taken:</b>	
<b>Permit Requirement (specify permit condition #)</b>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Step(s) Taken:</b>	

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

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

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

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

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

**Attachment A**  
**to Part 70 Operating Permit Renewal No. T019-29304-00006**

Jeffboat, LLC  
1030 E Market Street, Jeffersonville, IN 47130

**Fugitive Particulate Matter Emissions Control Plan**

**Purpose:**

This Fugitive Dust Control Plan is prepared in accordance with Indiana Rule 326 IAC 6-5-1 Fugitive Particulate Matter Emission Limitations and 326 IAC 6-5-4 Control measures for the reduction of fugitive emissions from paved and unpaved roads and parking lots. Plan implementation is on a year round basis unless otherwise changed by Indiana Department of Environmental Management.

Jeffboat's Responsible Official for this plan:  
Director of Safety  
Jeffboat LLC  
1030 East Market Street  
Jeffersonville, Indiana 47130  
Telephone 812-288-0200

**Discussion and future plans:**

Jeffboat's primary business is the construction of steel inland river barges and Towboats. The facility occupies approximately 85 acres of land along the Ohio River in Jeffersonville, Indiana. Approximately 60% of the land is utilized in the construction process and is occupied by large shop buildings, construction lines, launch way, and open storage areas. Facility roadways are 100% paved. There is an open unpaved material and equipment storage area at the east end of the facility.

Jeffboat has employee parking lots outside of the facility boundaries. The parking lots are paved with asphalt and/or chip and seal compound.

Vehicular traffic within the facility is restricted to Company owned vehicles, including a small fleet of pickup trucks, semi-trailers and forklifts. Privately owned vehicles are prohibited, excepting subcontractors and vendors conducting Company business.

**Paved roads and parking lots:**

Paved roads and parking lots are indicated on the attached site plan. Dust from these sources is controlled through utilization of road sweeping twice a month. In the event of inclement weather causing delays in this schedule sweeping will occur on the first dry day following inclement weather.

Estimated average vehicular traffic on these roads is approximately twenty (20) semi-trucks and one-hundred (100) company owned vehicles per day, approximately six (6) days a week.

**Unpaved open material storage areas:**

The actual material storage areas are unpaved; however, the travel paths within the storage areas have been paved with chip and seal compound. Control of dust emissions in areas of open material storage adjacent to roadways will be treated with a dust suppressant as necessary.

**Vehicle speed control:**

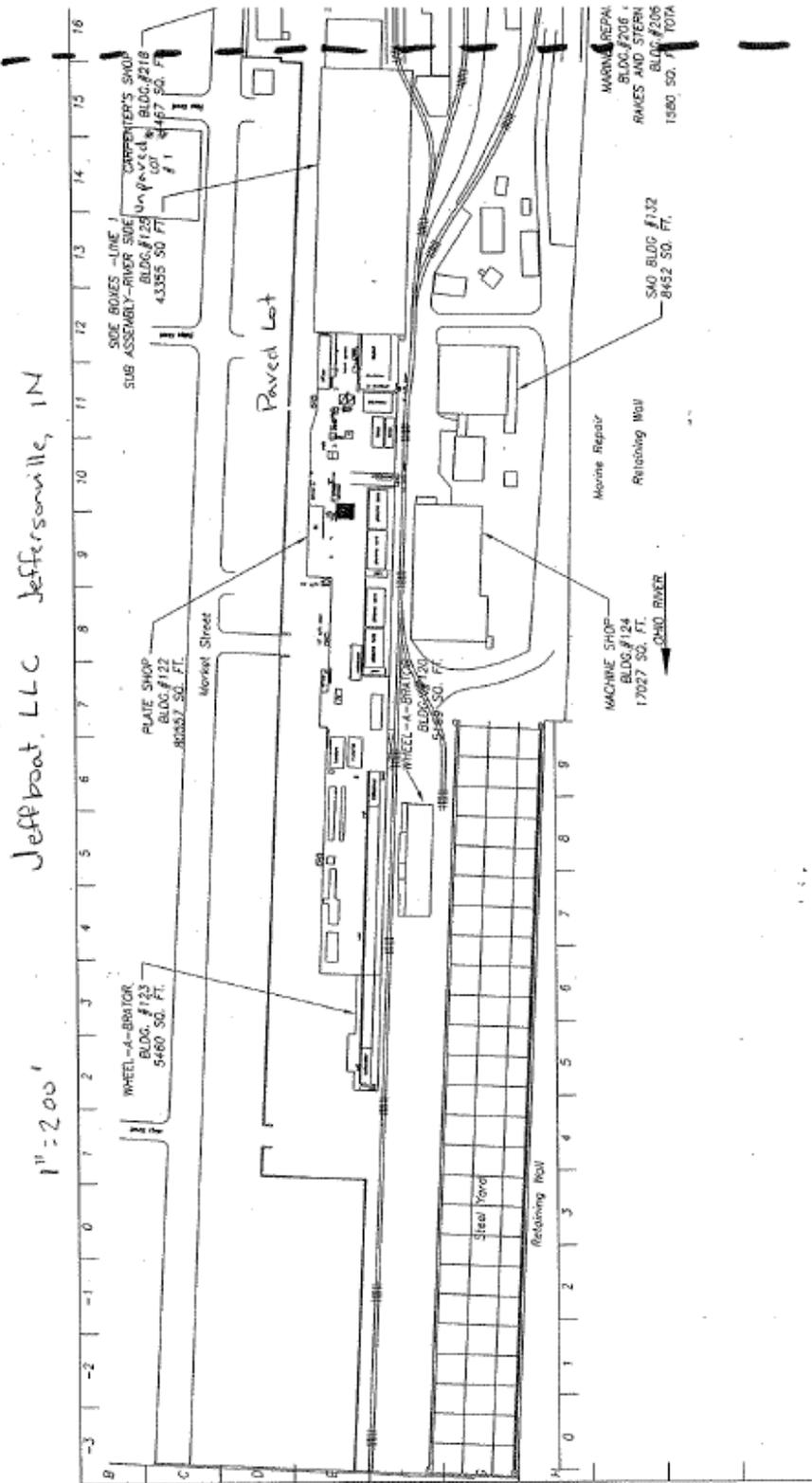
Speed limits within the facility are fifteen (15) miles-per-hour for paved and unpaved roads. Speed limits are monitored by plant security guards and the Safety Department.

**Monitoring and record keeping:**

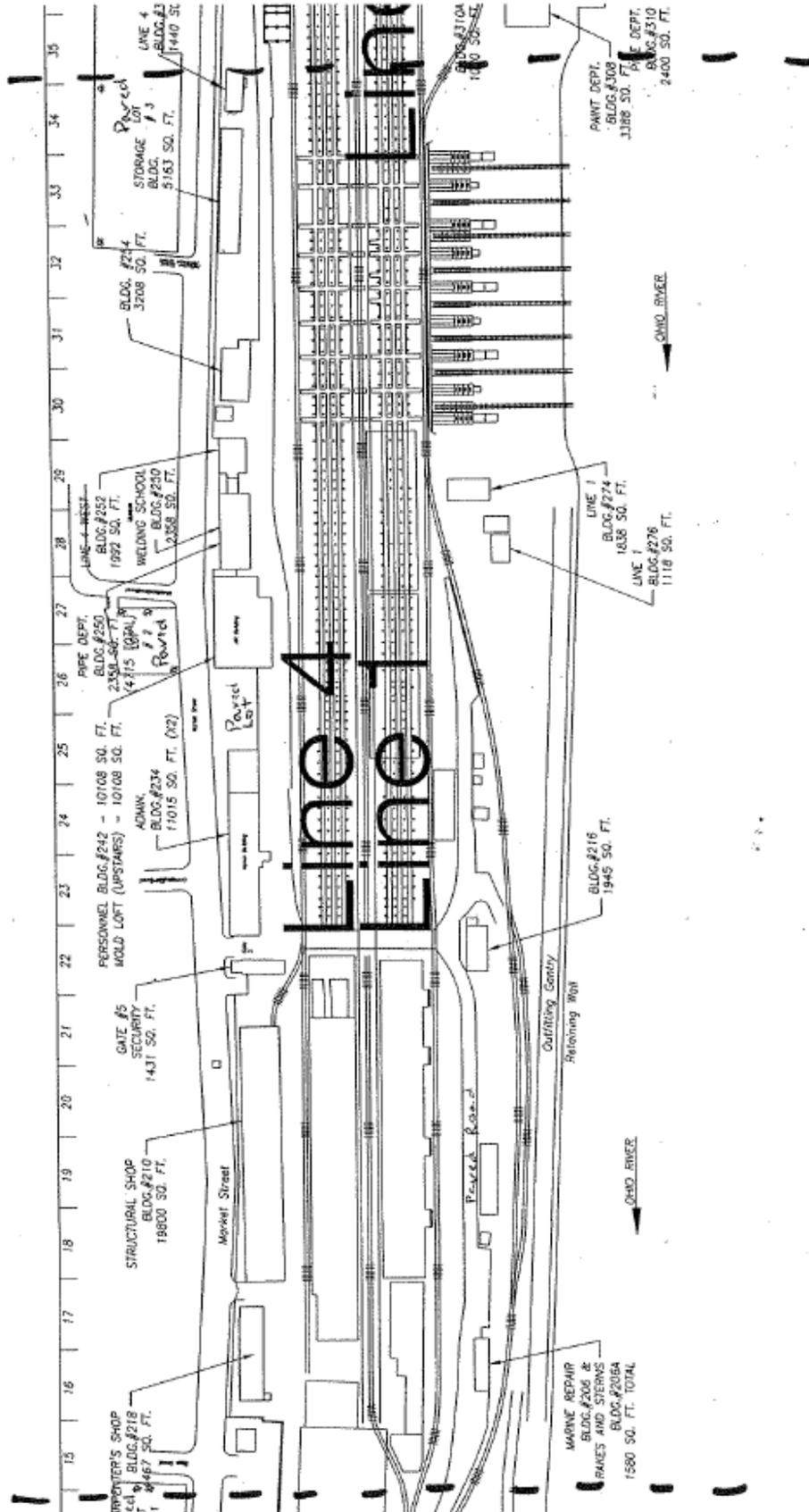
Records of control activities within the scope of this plan will be maintained by the Maintenance Department. Records will include as a minimum, date, type of control utilized, and observations of the following:

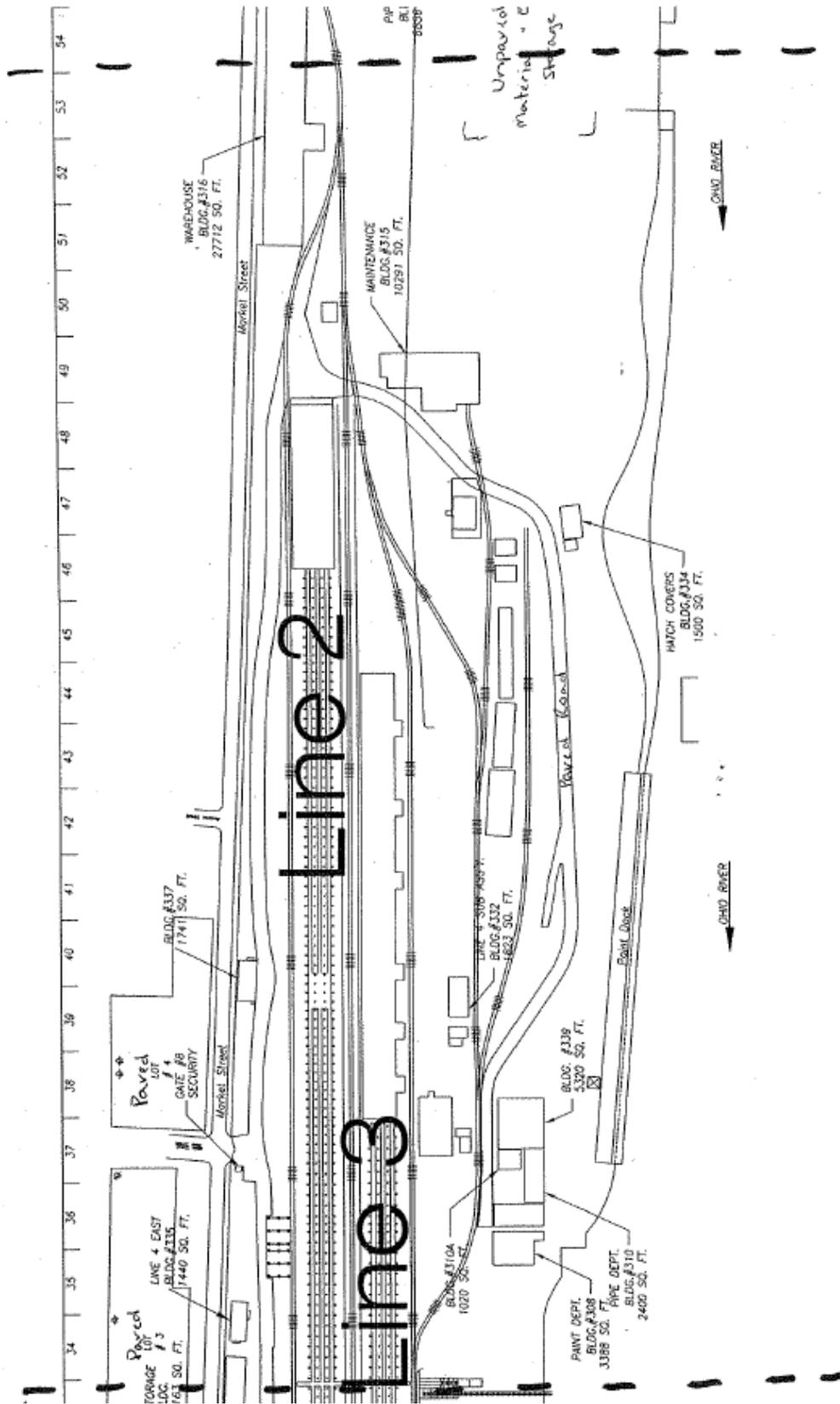
- Road sweeping, including weather delays;
- Application of chip and seal;
- Application of suppressants, including type of suppressant applied; and
- Paving activities by area.

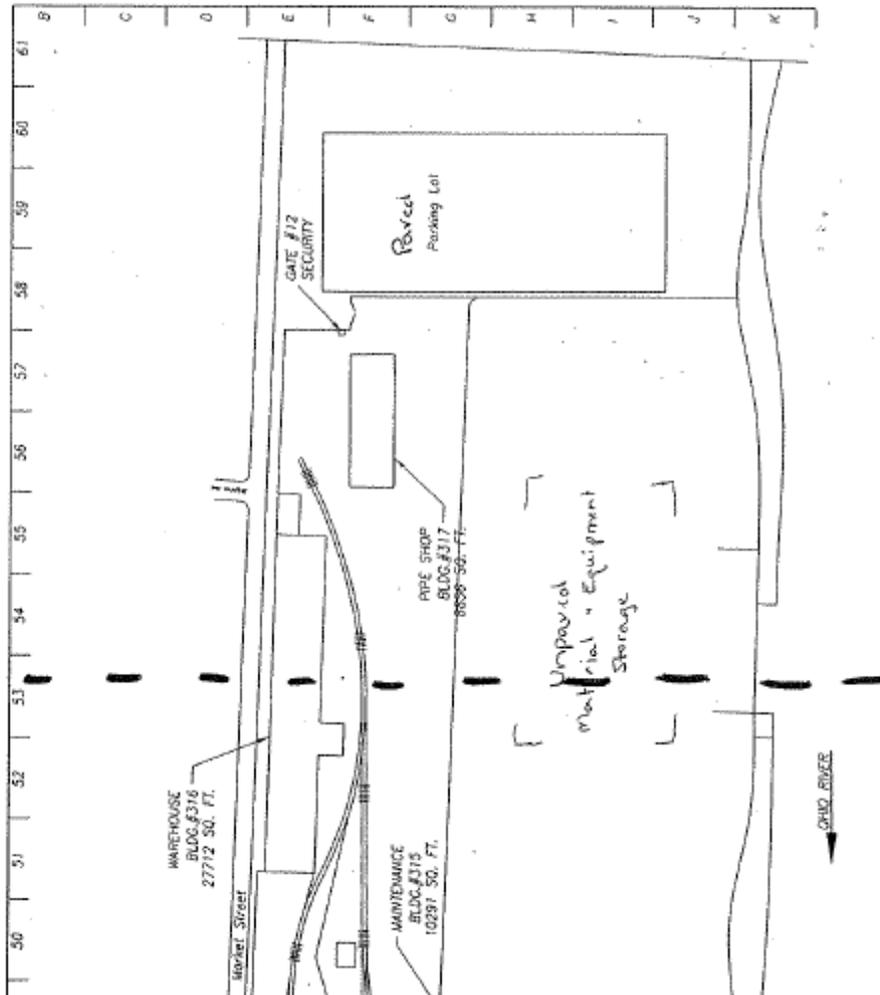
These records may be kept in a record book, or electronically. The Maintenance Manager will be provided a copy on a monthly basis. These records must be maintained for a minimum of five (5) years (three (3) years on-site and the remaining two (2) years the records may be maintained off-site).



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JUL 18 2011  
STATE OF INDIANA  
DEPT. OF ENVIRONMENTAL MGMT.  
OFFICE OF AIR QUALITY







**Attachment B**  
**to Part 70 Operating Permit Renewal No. T019-29304-00006**

Jeffboat, LLC  
1030 E Market Street, Jeffersonville, IN 47130

**40 CFR 63, Subpart II—National Emission Standards for Shipbuilding and Ship Repair (Surface Coating)**

**Source:** 60 FR 64336, Dec. 15, 1995, unless otherwise noted.

**§ 63.780 Relationship of subpart II to subpart A of this part.**

Table 1 of this subpart specifies the provisions of subpart A of this part that apply to owners and operators of sources subject to the provisions of this subpart.

**§ 63.781 Applicability.**

(a) The provisions of this subpart apply to shipbuilding and ship repair operations at any facility that is a major source.

(b) The provisions of this subpart do not apply to coatings used in volumes of less than 200 liters (52.8 gallons) per year, provided the total volume of coating exempt under this paragraph does not exceed 1,000 liters per year (264 gallons per year) at any facility. Coatings exempt under this paragraph shall be clearly labeled as “low-usage exempt,” and the volume of each such coating applied shall be maintained in the facility's records.

(c) The provisions of this subpart do not apply to coatings applied with hand-held, nonrefillable, aerosol containers or to unsaturated polyester resin (i.e., fiberglass lay-up) coatings. Coatings applied to suitably prepared fiberglass surfaces for protective or decorative purposes are subject to this subpart.

(d) If you are authorized in accordance with 40 CFR 63.783(c) to use an add-on control system as an alternative means of limiting emissions from coating operations, in response to an action to enforce the standards set forth in this subpart, you may assert an affirmative defense to a claim for civil penalties for exceedances of such standards that are caused by a malfunction, as defined in 40 CFR 63.2. Appropriate penalties may be assessed, however, if you fail to meet your burden of proving all the requirements in the affirmative defense. The affirmative defense shall not be available in response to claims for injunctive relief.

(1) To establish the affirmative defense in any action to enforce such a limit, you must timely meet the notification requirements in paragraph (d)(2) of this section, and must prove by a preponderance of evidence that:

(i) The excess emissions:

(A) Were caused by a sudden, infrequent and unavoidable failure of air pollution control and monitoring equipment, process equipment or a process to operate in a normal or usual manner; and

(B) Could not have been prevented through careful planning, proper design or better operation and maintenance practices; and

(C) Did not stem from any activity or event that could have been foreseen and avoided, or planned for; and

(D) Were not part of a recurring pattern indicative of inadequate design, operation, or maintenance; and

(ii) Repairs were made as expeditiously as possible when the applicable emission limitations were being exceeded. Off-shift and overtime labor were used, to the extent practicable to make these repairs; and

(iii) The frequency, amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent practicable during periods of such emissions; and

(iv) If the excess emissions resulted from a bypass of control equipment or a process, then the bypass was unavoidable to prevent loss of life, personal injury or severe property damage; and

(v) All possible steps were taken to minimize the impact of the excess emissions on ambient air quality, the environment and human health; and

(vi) All emissions monitoring and control systems were kept in operation if at all possible, consistent with safety and good air pollution control practices; and

(vii) All of the actions in response to the excess emissions were documented by properly signed, contemporaneous operating logs; and

(viii) At all times, the affected source was operated in a manner consistent with good practices for minimizing emissions; and

(ix) A written root cause analysis has been prepared, the purpose of which is to determine, correct and eliminate the primary causes of the malfunction and the excess emissions resulting from the malfunction event at issue. The analysis shall also specify, using best monitoring methods and engineering judgment, the amount of excess emissions that were the result of the malfunction.

(2) *Notification.* The owner or operator of the facility experiencing an exceedance of its emission limit(s) during a malfunction shall notify the Administrator by telephone or facsimile (FAX) transmission as soon as possible, but no later than 2 business days after the initial occurrence of the malfunction, if it wishes to avail itself of an affirmative defense to civil penalties for that malfunction. The owner or operator seeking to assert an affirmative defense shall also submit a written report to the Administrator within 45 days of the initial occurrence of the exceedance of the standard in this subpart to demonstrate, with all necessary supporting documentation, that it has met the requirements set forth in paragraph (d)(1) of this section. The owner or operator may seek an extension of this deadline for up to 30 additional days by submitting a written request to the Administrator before the expiration of the 45 day period. Until a request for an extension has been approved by the Administrator, the owner or operator is subject to the requirement to submit such report within 45 days of the initial occurrence of the exceedance.

[60 FR 64336, Dec. 15, 1995, as amended at 76 FR 72068, Nov. 21, 2011]

### **§ 63.782 Definitions.**

Terms used in this subpart are defined in the Clean Air Act (CAA), in subpart A of part 63, or in this section as follows:

*Add-on control system* means an air pollution control device such as a carbon absorber or incinerator that reduces pollution in an air stream by destruction or removal prior to discharge to the atmosphere.

*Affected source* means any shipbuilding or ship repair facility having surface coating operations with a minimum 1,000 liters (L) (264 gallons [gal]) annual marine coating usage that is subject to this subpart.

*Affirmative defense* means, in the context of an enforcement proceeding, a response or a defense put forward by a defendant, regarding which the defendant has the burden of proof, and the merits of which are independently and objectively evaluated in a judicial or administrative proceeding.

*Air flask specialty coating* means any special composition coating applied to interior surfaces of high pressure breathing air flasks to provide corrosion resistance and that is certified safe for use with breathing air supplies.

*Antenna specialty coating* means any coating applied to equipment through which electromagnetic signals must pass for reception or transmission.

*Antifoulant specialty coating* means any coating that is applied to the underwater portion of a vessel to prevent or reduce the attachment of biological organisms and that is registered with the EPA as a pesticide under the Federal Insecticide, Fungicide, and Rodenticide Act.

*As applied* means the condition of a coating at the time of application to the substrate, including any thinning solvent.

*As supplied* means the condition of a coating before any thinning, as sold and delivered by the coating manufacturer to the user.

*Batch* means the product of an individual production run of a coating manufacturer's process. A batch may vary in composition from other batches of the same product.

*Bitumens* mean black or brown materials that are soluble in carbon disulfide and consist mainly of hydrocarbons.

*Bituminous resin coating* means any coating that incorporates bitumens as a principal component and is formulated primarily to be applied to a substrate or surface to resist ultraviolet radiation and/or water.

*Certify* means, in reference to the volatile organic compounds (VOC) content or volatile organic hazardous air pollutants (VOHAP) content of a coating, to attest to the VOC content as determined through analysis by Method 24 of appendix A to 40 CFR part 60 or through use of forms and procedures outlined in appendix A of this subpart, or to attest to the VOHAP content as determined through an Administrator-approved test method. In the case of conflicting results, Method 24 of appendix A to 40 CFR part 60 shall take precedence over the forms and procedures outlined in appendix A to this subpart for the options in which VOC is used as a surrogate for VOHAP.

*Coating* means any material that can be applied as a thin layer to a substrate and which cures to form a continuous solid film.

*Cold-weather time period* means any time during which the ambient temperature is below 4.5 °C (40 °F) and coating is to be applied.

*Container of coating* means the container from which the coating is applied, including but not limited to a bucket or pot.

*Cure volatiles* means reaction products which are emitted during the chemical reaction which takes place in some coating films at the cure temperature. These emissions are other than those from the solvents in

the coating and may, in some cases, comprise a significant portion of total VOC and/or VOHAP emissions.

*Epoxy* means any thermoset coating formed by reaction of an epoxy resin (i.e., a resin containing a reactive epoxide with a curing agent).

*Exempt compounds* means specified organic compounds that are not considered VOC due to negligible photochemical reactivity. Exempt compounds are specified in 40 CFR 51.100(s).

*Facility* means all contiguous or adjoining property that is under common ownership or control, including properties that are separated only by a road or other public right-of-way.

*General use coating* means any coating that is not a specialty coating.

*Hazardous air pollutants (HAP)* means any air pollutant listed in or pursuant to section 112(b) of the CAA.

*Heat resistant specialty coating* means any coating that during normal use must withstand a temperature of at least 204 °C (400 °F).

*High-gloss specialty coating* means any coating that achieves at least 85 percent reflectance on a 60 degree meter when tested by ASTM D523–89 (incorporation by reference—see §63.14).

*High-temperature specialty coating* means any coating that during normal use must withstand a temperature of at least 426 °C (800 °F).

*Inorganic zinc (high-build) specialty coating* means a coating that contains 960 grams per liter (8 pounds per gallon) or more elemental zinc incorporated into an inorganic silicate binder that is applied to steel to provide galvanic corrosion resistance. (These coatings are typically applied at more than 2 mil dry film thickness.)

*Major source* means any source that emits or has the potential to emit, in the aggregate, 9.1 megagrams per year (10 tons per year) or more of any HAP or 22.7 megagrams per year (25 tons per year) or more of any combination of HAP.

*Maximum allowable thinning ratio* means the maximum volume of thinner that can be added per volume of coating without violating the standards of §63.783(a), as determined using Equation 1 of this subpart.

*Military exterior specialty coating* or Chemical Agent Resistant Coatings (“CARC”) means any exterior topcoat applied to military or U.S. Coast Guard vessels that are subject to specific chemical, biological, and radiological washdown requirements.

*Mist specialty coating* means any low viscosity, thin film, epoxy coating applied to an inorganic zinc primer that penetrates the porous zinc primer and allows the occluded air to escape through the paint film prior to curing.

*Navigational aids specialty coating* means any coating applied to Coast Guard buoys or other Coast Guard waterway markers when they are recoated aboard ship at their usage site and immediately returned to the water.

*Nonskid specialty coating* means any coating applied to the horizontal surfaces of a marine vessel for the specific purpose of providing slip resistance for personnel, vehicles, or aircraft.

*Nonvolatiles (or volume solids)* means substances that do not evaporate readily. This term refers to the film-forming material of a coating.

*Normally closed* means a container or piping system is closed unless an operator is actively engaged in adding or removing material.

*Nuclear specialty coating* means any protective coating used to seal porous surfaces such as steel (or concrete) that otherwise would be subject to intrusion by radioactive materials. These coatings must be resistant to long-term (service life) cumulative radiation exposure (ASTM D4082–89 [incorporation by reference—see §63.14]), relatively easy to decontaminate (ASTM D4256–89 or 94 [reapproved 1994] [incorporation by reference—see §63.14]), and resistant to various chemicals to which the coatings are likely to be exposed (ASTM D3912–80 [incorporation by reference—see §63.14]). [For nuclear coatings, see the general protective requirements outlined by the U.S. Nuclear Regulatory Commission in a report entitled “U.S. Atomic Energy Commission Regulatory Guide 1.54” dated June 1973, available through the Government Printing Office at (202) 512–2249 as document number A74062–00001.]

*Operating parameter value* means a minimum or maximum value established for a control device or process parameter that, if achieved by itself or in combination with one or more other operating parameter values, determines that an owner or operator has complied with an applicable emission limitation or standard.

*Organic zinc specialty coating* means any coating derived from zinc dust incorporated into an organic binder that contains more than 960 grams of elemental zinc per liter (8 pounds per gallon) of coating, as applied, and that is used for the expressed purpose of corrosion protection.

*Pleasure craft* means any marine or fresh-water vessel used by individuals for noncommercial, nonmilitary, and recreational purposes that is less than 20 meters in length. A vessel rented exclusively to or chartered by individuals for such purposes shall be considered a pleasure craft.

*Pretreatment wash primer specialty coating* means any coating that contains a minimum of 0.5 percent acid, by mass, and is applied only to bare metal to etch the surface and enhance adhesion of subsequent coatings.

*Repair and maintenance of thermoplastic coating of commercial vessels (specialty coating)* means any vinyl, chlorinated rubber, or bituminous resin coating that is applied over the same type of existing coating to perform the partial recoating of any in-use commercial vessel. (This definition does not include coal tar epoxy coatings, which are considered “general use” coatings.)

*Rubber camouflage specialty coating* means any specially formulated epoxy coating used as a camouflage topcoat for exterior submarine hulls and sonar domes.

*Sealant for thermal spray aluminum* means any epoxy coating applied to thermal spray aluminum surfaces at a maximum thickness of 1 dry mil.

*Ship* means any marine or fresh-water vessel used for military or commercial operations, including self-propelled vessels, those propelled by other craft (barges), and navigational aids (buoys). This definition includes, but is not limited to, all military and Coast Guard vessels, commercial cargo and passenger (cruise) ships, ferries, barges, tankers, container ships, patrol and pilot boats, and dredges. For purposes of this subpart, pleasure crafts and offshore oil and gas drilling platforms are not considered ships.

*Shipbuilding and ship repair operations* means any building, repair, repainting, converting, or alteration of ships.

*Special marking specialty coating* means any coating that is used for safety or identification applications, such as markings on flight decks and ships' numbers.

*Specialty coating* means any coating that is manufactured and used for one of the specialized applications described within this list of definitions.

*Specialty interior coating* means any coating used on interior surfaces aboard U.S. military vessels pursuant to a coating specification that requires the coating to meet specified fire retardant and low toxicity requirements, in addition to the other applicable military physical and performance requirements.

*Tack specialty coating* means any thin film epoxy coating applied at a maximum thickness of 2 dry mils to prepare an epoxy coating that has dried beyond the time limit specified by the manufacturer for the application of the next coat.

*Thinner* means a liquid that is used to reduce the viscosity of a coating and that evaporates before or during the cure of a film.

*Thinning ratio* means the volumetric ratio of thinner to coating, as supplied.

*Thinning solvent*: see Thinner.

*Undersea weapons systems specialty coating* means any coating applied to any component of a weapons system intended to be launched or fired from under the sea.

*Volatile organic compounds (VOC)* is as defined in §51.100(s) of this chapter.

*Volatile organic hazardous air pollutants (VOHAP)* means any compound listed in or pursuant to section 112(b) of the CAA that contains carbon, excluding metallic carbides and carbonates. This definition includes VOC listed as HAP and exempt compounds listed as HAP.

*Weld-through preconstruction primer (specialty coating)* means a coating that provides corrosion protection for steel during inventory, is typically applied at less than 1 mil dry film thickness, does not require removal prior to welding, is temperature resistant (burn back from a weld is less than 1.25 centimeters [0.5 inch]), and does not normally require removal before applying film-building coatings, including inorganic zinc high-build coatings. When constructing new vessels, there may be a need to remove areas of weld-through preconstruction primer due to surface damage or contamination prior to application of film-building coatings.

[60 FR 64336, Dec. 15, 1995, as amended at 65 FR 62215, Oct. 17, 2000; 76 FR 72069, Nov. 21, 2011]

### **§ 63.783 Standards.**

(a) No owner or operator of any existing or new affected source shall cause or allow the application of any coating to a ship with an as-applied VOHAP content exceeding the applicable limit given in Table 2 of this subpart, as determined by the procedures described in §63.785 (c)(1) through (c)(4). For the compliance procedures described in §63.785 (c)(1) through (c)(3), VOC shall be used as a surrogate for VOHAP, and Method 24 of appendix A to 40 CFR part 60 shall be used as the definitive measure for determining compliance. For the compliance procedure described in §63.785(c)(4), an alternative test method capable of measuring independent VOHAP shall be used to determine compliance. The method must be submitted to and approved by the Administrator.

(b) Each owner or operator of a new or existing affected source shall ensure that:

(1) At all times the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(2) All handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills.

(3) All containers, tanks, vats, drums, and piping systems are free of cracks, holes, and other defects and remain closed unless materials are being added to or removed from them.

(c) *Approval of alternative means of limiting emissions.* (1) The owner or operator of an affected source may apply to the Administrator for permission to use an alternative means (such as an add-on control system) of limiting emissions from coating operations. The application must include:

(i) An engineering material balance evaluation that provides a comparison of the emissions that would be achieved using the alternative means to those that would result from using coatings that comply with the limits in Table 2 of this subpart, or the results from an emission test that accurately measures the capture efficiency and control device efficiency achieved by the control system and the composition of the associated coatings so that the emissions comparison can be made;

(ii) A proposed monitoring protocol that includes operating parameter values to be monitored for compliance and an explanation of how the operating parameter values will be established through a performance test; and

(iii) Details of appropriate recordkeeping and reporting procedures.

(2) The Administrator shall approve the alternative means of limiting emissions if, in the Administrator's judgment, postcontrol emissions of VOHAP per volume applied solids will be no greater than those from the use of coatings that comply with the limits in Table 2 of this subpart.

(3) The Administrator may condition approval on operation, maintenance, and monitoring requirements to ensure that emissions from the source are no greater than those that would otherwise result from this subpart.

[60 FR 64336, Dec. 15, 1995, as amended at 76 FR 72069, Nov. 21, 2011]

#### **§ 63.784 Compliance dates.**

(a) Each owner or operator of an existing affected source shall comply within two years after the effective date of this subpart.

(b) Each owner or operator of an existing unaffected area source that increases its emissions of (or its potential to emit) HAP such that the source becomes a major source that is subject to this subpart shall comply within 1 year after the date of becoming a major source.

(c) Each owner or operator of a new or reconstructed source shall comply with this subpart according to the schedule in §63.6(b).

[60 FR 64336, Dec. 15, 1995, as amended at 61 FR 30816, June 18, 1996]

**§ 63.785 Compliance procedures.**

(a) For each batch of coating that is received by an affected source, the owner or operator shall (see Figure 1 of this section for a flow diagram of the compliance procedures):

- (1) Determine the coating category and the applicable VOHAP limit as specified in §63.783(a).
- (2) Certify the as-supplied VOC content of the batch of coating. The owner or operator may use a certification supplied by the manufacturer for the batch, although the owner or operator retains liability should subsequent testing reveal a violation. If the owner or operator performs the certification testing, only one of the containers in which the batch of coating was received is required to be tested.
- (b)(1) In lieu of testing each batch of coating, as applied, the owner or operator may determine compliance with the VOHAP limits using any combination of the procedures described in paragraphs (c)(1), (c)(2), (c)(3), and (c)(4) of this section. The procedure used for each coating shall be determined and documented prior to application.
- (2) The results of any compliance demonstration conducted by the affected source or any regulatory agency using Method 24 shall take precedence over the results using the procedures in paragraphs (c)(1), (c)(2), or (c)(3) of this section.
- (3) The results of any compliance demonstration conducted by the affected source or any regulatory agency using an approved test method to determine VOHAP content shall take precedence over the results using the procedures in paragraph (c)(4) of this section.

(c)(1) *Coatings to which thinning solvent will not be added.* For coatings to which thinning solvent (or any other material) will not be added under any circumstance or to which only water is added, the owner or operator of an affected source shall comply as follows:

- (i) Certify the as-applied VOC content of each batch of coating.
- (ii) Notify the persons responsible for applying the coating that no thinning solvent may be added to the coating by affixing a label to each container of coating in the batch or through another means described in the implementation plan required in §63.787(b).
- (iii) If the certified as-applied VOC content of each batch of coating used during a calendar month is less than or equal to the applicable VOHAP limit in §63.783(a) (either in terms of g/L of coating or g/L of solids), then compliance is demonstrated for that calendar month, unless a violation is revealed using Method 24 of appendix A to 40 CFR part 60.

(2) *Coatings to which thinning solvent will be added—coating-by-coating compliance.* For a coating to which thinning solvent is routinely or sometimes added, the owner or operator shall comply as follows:

(i) Prior to the first application of each batch, designate a single thinner for the coating and calculate the maximum allowable thinning ratio (or ratios, if the affected source complies with the cold-weather limits in addition to the other limits specified in Table 2 of this subpart) for each batch as follows:

$$R = \frac{(V_s)(\text{VOHAP limit}) - m_{\text{VOC}}}{D_{\#}} \quad \text{Eqn. 1}$$

where:

R=Maximum allowable thinning ratio for a given batch (L thinner/L coating as supplied);

V<sub>s</sub>=Volume fraction of solids in the batch as supplied (L solids/L coating as supplied);

VOHAP limit=Maximum allowable as-applied VOHAP content of the coating (g VOHAP/L solids);

m<sub>VOC</sub>=VOC content of the batch as supplied [g VOC (including cure volatiles and exempt compounds on the HAP list)/L coating (including water and exempt compounds) as supplied];

D<sub>th</sub>=Density of the thinner (g/L).

If V<sub>s</sub> is not supplied directly by the coating manufacturer, the owner or operator shall determine V<sub>s</sub> as follows:

$$V_s = 1 - \frac{m_{volatiles}}{D_{avg}} \quad \text{Eqn. 2}$$

where:

m<sub>volatiles</sub>=Total volatiles in the batch, including VOC, water, and exempt compounds (g/L coating); and

D<sub>avg</sub>=Average density of volatiles in the batch (g/L).

The procedures specified in §63.786(d) may be used to determine the values of variables defined in this paragraph. In addition, the owner or operator may choose to construct nomographs, based on Equation 1 of this subpart, similar or identical to the one provided in appendix B of this subpart as a means of easily estimating the maximum allowable thinning ratio.

(ii) Prior to the first application of each batch, notify painters and other persons, as necessary, of the designated thinner and maximum allowable thinning ratio(s) for each batch of the coating by affixing a label to each container of coating or through another means described in the implementation plan required in §63.787(b).

(iii) By the 15th day of each calendar month, determine the volume of each batch of the coating used, as supplied, during the previous month.

(iv) By the 15th day of each calendar month, determine the total allowable volume of thinner for the coating used during the previous month as follows:

$$V_{th} = \sum_{i=1}^n (R \times V_b)_i + \sum_{i=1}^n (R_{cold} \times V_{b-cold})_i \quad \text{Eqn. 3}$$

where:

V<sub>th</sub>=Total allowable volume of thinner for the previous month (L thinner);

V<sub>b</sub>=Volume of each batch, as supplied and before being thinned, used during non-cold-weather days of the previous month (L coating as supplied);

$R_{cold}$ =Maximum allowable thinning ratio for each batch used during cold-weather days (L thinner/L coating as supplied);

$V_{b-cold}$ =Volume of each batch, as supplied and before being thinned, used during cold-weather days of the previous month (L coating as supplied);

$i$ =Each batch of coating; and

$n$ =Total number of batches of the coating.

(v) By the 15th day of each calendar month, determine the volume of thinner actually used with the coating during the previous month.

(vi) If the volume of thinner actually used with the coating [paragraph (c)(3)(v) of this section] is less than or equal to the total allowable volume of thinner for the coating [paragraph (c)(3)(iv) of this section], then compliance is demonstrated for the coating for the previous month, unless a violation is revealed using Method 24 of appendix A to 40 CFR part 60.

(3) *Coatings to which the same thinning solvent will be added—group compliance.* For coatings to which the same thinning solvent (or other material) is routinely or sometimes added, the owner or operator shall comply as follows:

(i) Designate a single thinner to be added to each coating during the month and “group” coatings according to their designated thinner.

(ii) Prior to the first application of each batch, calculate the maximum allowable thinning ratio (or ratios, if the affected source complies with the cold-weather limits in addition to the other limits specified in Table 2 of this subpart) for each batch of coating in the group using the equations in paragraph (c)(2) of this section.

(iii) Prior to the first application of each “batch,” notify painters and other persons, as necessary, of the designated thinner and maximum allowable thinning ratio(s) for each batch in the group by affixing a label to each container of coating or through another means described in the implementation plan required in §63.787(b).

(iv) By the 15th day of each calendar month, determine the volume of each batch of the group used, as supplied, during the previous month.

(v) By the 15th day of each calendar month, determine the total allowable volume of thinner for the group for the previous month using Equation 3 of this subpart.

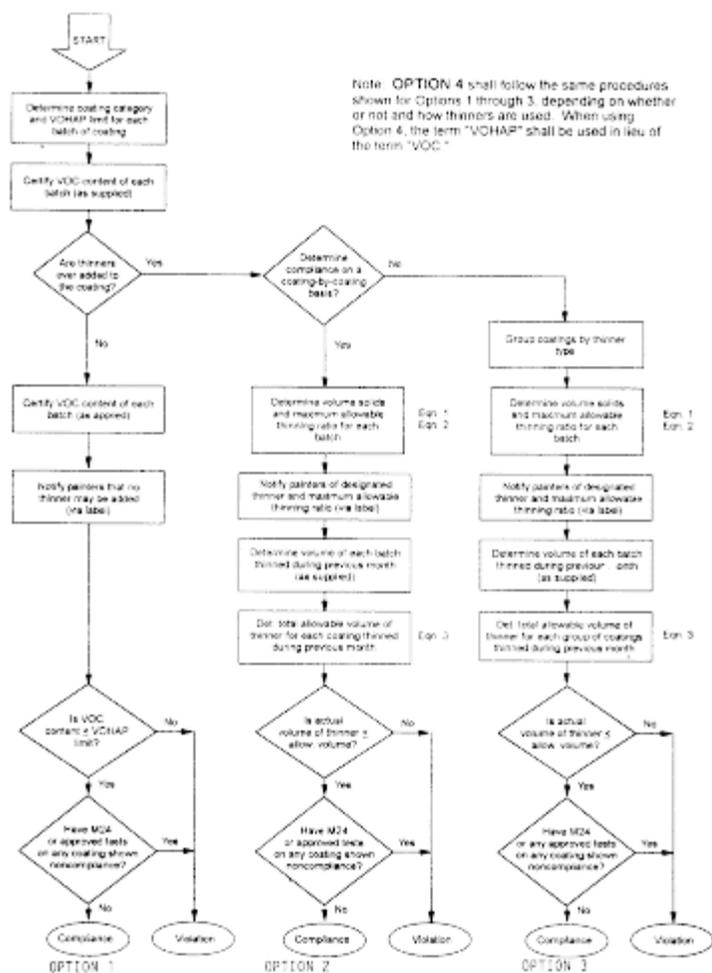
(vi) By the 15th day of each calendar month, determine the volume of thinner actually used with the group during the previous month.

(vii) If the volume of thinner actually used with the group [paragraph (c)(3)(vi) of this section] is less than or equal to the total allowable volume of thinner for the group [paragraph (c)(3)(v) of this section], then compliance is demonstrated for the group for the previous month, unless a violation is revealed using Method 24 of appendix A to 40 CFR part 60.

(4) *Demonstration of compliance through an alternative (i.e., other than Method 24 of appendix A to 40 CFR part 60) test method.* The owner or operator shall comply as follows:

- (i) Certify the as-supplied VOHAP content (g VOHAP/L solids) of each batch of coating.
- (ii) If no thinning solvent will be added to the coating, the owner or operator of an affected source shall follow the procedure described in §63.785(c)(1), except that VOHAP content shall be used in lieu of VOC content.
- (iii) If thinning solvent will be added to the coating, the owner or operator of an affected source shall follow the procedure described in §63.785(c)(2) or (3), except that in Equation 1 of this subpart: the term " $m_{VOC}$ " shall be replaced by the term " $m_{VOHAP}$ ," defined as the VOHAP content of the coating as supplied (g VOHAP/L coating) and the term " $D_{th}$ " shall be replaced by the term " $D_{th}(VOHAP)$ " defined as the average density of the VOHAP thinner(s) (g/L).
- (d) A violation revealed through any approved test method shall result in a 1-day violation for enforcement purposes. A violation revealed through the recordkeeping procedures described in paragraphs (c)(1) through (c)(4) of this section shall result in a 30-day violation for enforcement purposes, unless the owner or operator provides sufficient data to demonstrate the specific days during which noncompliant coatings were applied.
- (e) Continuous compliance requirements. You must demonstrate continuous compliance with the emissions standards and operating limits by using the performance test methods and procedures in §63.786 for each affected source.
- (1) *General requirements.* (i) You must monitor and collect data, and provide a site specific monitoring plan, as required by §§63.783, 63.785, 63.786 and 63.787.
- (ii) Except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities (including, as applicable, calibration checks and required zero and span adjustments), you must operate the monitoring system and collect data at all required intervals at all times the affected source is operating, and periods of malfunction. Any period for which data collection is required and the operation of the Continuous Emissions Monitoring System (CEMS) is not otherwise exempt and for which the monitoring system is out-of-control and data are not available for required calculations constitutes a deviation from the monitoring requirements.
- (iii) You may not use data recorded during monitoring system malfunctions, repairs associated with monitoring system malfunctions or required monitoring system quality assurance or control activities in calculations used to report emissions or operating levels. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions. The owner or operator must use all the data collected during all other periods in assessing the operation of the control device and associated control system.
- (2) [Reserved]

Figure 1 to §63.785 Flow diagram of compliance procedures



[60 FR 64336, Dec. 15, 1995, as amended at 76 FR 72069, Nov. 21, 2011]

**§ 63.786 Test methods and procedures.**

(a) For the compliance procedures described in §63.785(c) (1) through (c)(3), Method 24 of 40 CFR part 60, appendix A, is the definitive method for determining the VOC content of coatings, as supplied or as applied. When a coating or thinner contains exempt compounds that are volatile HAP or VOHAP, the owner or operator shall ensure, when determining the VOC content of a coating, that the mass of these exempt compounds is included.

(b) For the compliance procedure described in §63.785(c)(4), the Administrator must approve the test method for determining the VOHAP content of coatings and thinners. As part of the approval, the test method must meet the specified accuracy limits indicated below for sensitivity, duplicates, repeatability, and reproducibility coefficient of variation each determined at the 95 percent confidence limit. Each percentage value below is the corresponding coefficient of variation multiplied by 2.8 as in the ASTM Method E180-93: Standard Practice for Determining the Precision of ASTM Methods for Analysis and Testing of Industrial Chemicals (incorporation by reference—see §63.14).

(1) *Sensitivity.* The overall sensitivity must be sufficient to identify and calculate at least one mass percent of the compounds of interest based on the original sample. The sensitivity is defined as ten times the

noise level as specified in ASTM Method D3257–93: Standard Test Methods for Aromatics in Mineral Spirits by Gas Chromatography (incorporation by reference—see §63.14). In determining the sensitivity, the level of sample dilution must be factored in.

(2) *Repeatability*. First, at the 0.1–5 percent analyte range the results would be suspect if duplicates vary by more than 6 percent relative and/or day to day variation of mean duplicates by the same analyst exceeds 10 percent relative. Second, at greater than 5 percent analyte range the results would be suspect if duplicates vary by more than 5 percent relative and/or day to day variation of duplicates by the same analyst exceeds 5 percent relative.

(3) *Reproducibility*. First, at the 0.1–5 percent analyte range the results would be suspect if lab to lab variation exceeds 60 percent relative. Second, at greater than 5 percent range the results would be suspect if lab to lab variation exceeds 20 percent relative.

(4) Any test method should include information on the apparatus, reagents and materials, analytical procedure, procedure for identification and confirmation of the volatile species in the mixture being analyzed, precision and bias, and other details to be reported. The reporting should also include information on quality assurance (QA) auditing.

(5) Multiple and different analytical techniques must be used for positive identification if the components in a mixture under analysis are not known. In such cases a single column gas chromatograph (GC) may not be adequate. A combination of equipment may be needed such as a GC/mass spectrometer or GC/infrared system. (If a GC method is used, the operator must use practices in ASTM Method E260–91 or 96: Standard Practice for Gas Chromatography [incorporation by reference—see §63.14].)

(c) A coating manufacturer or the owner or operator of an affected source may use batch formulation data as a test method in lieu of Method 24 of appendix A to 40 CFR part 60 to certify the as-supplied VOC content of a coating if the manufacturer or the owner or operator has determined that batch formulation data have a consistent and quantitatively known relationship to Method 24 results. This determination shall consider the role of cure volatiles, which may cause emissions to exceed an amount based solely upon coating formulation data. Notwithstanding such determination, in the event of conflicting results, Method 24 of appendix A of 40 CFR part 60 shall take precedence.

(d) Each owner or operator of an affected source shall use or ensure that the manufacturer uses the form and procedures mentioned in appendix A of this subpart to determine values for the thinner and coating parameters used in Equations 1 and 2 of this subpart. The owner or operator shall ensure that the coating/thinner manufacturer (or supplier) provides information on the VOC and VOHAP contents of the coatings/thinners and the procedure(s) used to determine these values.

(e) For add-on control systems approved for use in limiting emissions from coating operations pursuant to §63.783(c), performance tests shall be conducted under such conditions as the Administrator specifies to the owner or operator based on representative performance of the affected source for the period being tested. Upon request, the owner or operator shall make available to the Administrator such records as may be necessary to demonstrate the conditions present during performance tests.

[60 FR 64336, Dec. 15, 1995, as amended at 65 FR 62215, Oct. 17, 2000; 76 FR 72069, Nov. 21, 2011]

#### **§ 63.787 Notification requirements.**

(a) Each owner or operator of an affected source shall comply with all applicable notification requirements in §63.9(a) through (d) and (i) through (j), with the exception that the deadline specified in §63.9(b) (2) and (3) shall be extended from 120 days to 180 days. Any owner or operator that receives approval

pursuant to §63.783(c) to use an add-on control system to control coating emissions shall comply with the applicable requirements of §63.9(e) through (h).

(b) *Implementation plan.* The provisions of §63.9(a) apply to the requirements of this paragraph.

(1) Each owner or operator of an affected source shall:

(i) Prepare a written implementation plan that addresses each of the subject areas specified in paragraph (b)(3) of this section; and

(ii) Not later than one year after the effective date of this subpart, submit the implementation plan to the Administrator along with the notification required by §63.9(b)(2) or (b)(5) of subpart A, as applicable.

(2) [Reserved]

(3) *Implementation plan contents.* Each implementation plan shall address the following subject areas:

(i) *Coating compliance procedures.* The implementation plan shall include the compliance procedure(s) under §63.785(c) that the source intends to use.

(ii) *Recordkeeping procedures.* The implementation plan shall include the procedures for maintaining the records required under §63.788, including the procedures for gathering the necessary data and making the necessary calculations.

(iii) *Transfer, handling, and storage procedures.* The implementation plan shall include the procedures for ensuring compliance with §63.783(b).

(4) *Major sources that intend to become area sources by the compliance date.* Existing major sources that intend to become area sources by the December 16, 1997 compliance date may choose to submit, in lieu of the implementation plan required under paragraph (b)(1) of this section, a statement that, by the compliance date, the major source intends to obtain and comply with federally enforceable limits on their potential to emit which make the facility an area source.

[60 FR 64336, Dec. 15, 1995, as amended at 61 FR 30816, June 18, 1996]

#### **§ 63.788 Recordkeeping and reporting requirements.**

(a) Each owner or operator of an affected source shall comply with the applicable recordkeeping and reporting requirements in §63.10 (a), (b), (d), and (f). Any owner that receives approval pursuant to §63.783(c) to use an add-on control system to control coating emissions shall also comply with the applicable requirements of §63.10 (c) and (e). A summary of recordkeeping and reporting requirements is provided in Table 3 of this subpart.

(b) *Recordkeeping requirements.* (1) Each owner or operator of a major source shipbuilding or ship repair facility having surface coating operations with less than 1000 liters (L) (264 gallons (gal)) annual marine coating usage shall record the total volume of coating applied at the source to ships. Such records shall be compiled monthly and maintained for a minimum of 5 years.

(2) Each owner or operator of an affected source shall compile records on a monthly basis and maintain those records for a minimum of 5 years. At a minimum, these records shall include:

(i) All documentation supporting initial notification;

- (ii) A copy of the affected source's approved implementation plan;
- (iii) The volume of each low-usage-exempt coating applied;
- (iv) Identification of the coatings used, their appropriate coating categories, and the applicable VOHAP limit;
- (v) Certification of the as-supplied VOC content of each batch of coating;
- (vi) A determination of whether containers meet the standards as described in §63.783(b)(2); and
- (vii) The results of any Method 24 of appendix A to 40 CFR part 60 or approved VOHAP measurement test conducted on individual containers of coating, as applied.

(3) The records required by paragraph (b)(2) of this section shall include additional information, as determined by the compliance procedure(s) described in §63.785(c) that each affected source followed:

(i) *Coatings to which thinning solvent will not be added.* The records maintained by facilities demonstrating compliance using the procedure described in §63.785(c)(1) shall contain the following information:

(A) Certification of the as-applied VOC content of each batch of coating; and

(B) The volume of each coating applied.

(ii) *Coatings to which thinning solvent will be added—coating-by-coating compliance.* The records maintained by facilities demonstrating compliance using the procedure described in §63.785(c)(2) shall contain the following information:

(A) The density and mass fraction of water and exempt compounds of each thinner and the volume fraction of solids (nonvolatiles) in each batch, including any calculations;

(B) The maximum allowable thinning ratio (or ratios, if the affected source complies with the cold-weather limits in addition to the other limits specified in Table 2 of this subpart) for each batch of coating, including calculations;

(C) If an affected source chooses to comply with the cold-weather limits, the dates and times during which the ambient temperature at the affected source was below 4.5 °C (40 °F) at the time the coating was applied and the volume used of each batch of the coating, as supplied, during these dates;

(D) The volume used of each batch of the coating, as supplied;

(E) The total allowable volume of thinner for each coating, including calculations; and

(F) The actual volume of thinner used for each coating.

(iii) *Coatings to which the same thinning solvent will be added—group compliance.* The records maintained by facilities demonstrating compliance using the procedure described in §63.785(c)(3) shall contain the following information:

(A) The density and mass fraction of water and exempt compounds of each thinner and the volume fraction of solids in each batch, including any calculations;

(B) The maximum allowable thinning ratio (or ratios, if the affected source complies with the cold-weather limits in addition to the other limits specified in Table 2 of this subpart) for each batch of coating, including calculations;

(C) If an affected source chooses to comply with the cold-weather limits, the dates and times during which the ambient temperature at the affected source was below 4.5 °C (40 °F) at the time the coating was applied and the volume used of each batch in the group, as supplied, during these dates;

(D) Identification of each group of coatings and their designated thinners;

(E) The volume used of each batch of coating in the group, as supplied;

(F) The total allowable volume of thinner for the group, including calculations; and

(G) The actual volume of thinner used for the group.

(iv) *Demonstration of compliance through an alternative (i.e., non-Method 24 in appendix A to 40 CFR part 60) test method.* The records maintained by facilities demonstrating compliance using the procedure described in §63.785(c)(4) shall contain the following information:

(A) Identification of the Administrator-approved VOHAP test method or certification procedure;

(B) For coatings to which the affected source does not add thinning solvents, the source shall record the certification of the as-supplied and as-applied VOHAP content of each batch and the volume of each coating applied;

(C) For coatings to which the affected source adds thinning solvent on a coating-by-coating basis, the source shall record all of the information required to be recorded by paragraph (b)(3)(ii) of this section; and

(D) For coatings to which the affected source adds thinning solvent on a group basis, the source shall record all of the information required to be recorded by paragraph (b)(3)(iii) of this section.

(4) If the owner or operator of an affected source detects a violation of the standards specified in §63.783, the owner or operator shall, for the remainder of the reporting period during which the violation(s) occurred, include the following information in his or her records:

(i) A summary of the number and duration of deviations during the reporting period, classified by reason, including known causes for which a Federally-approved or promulgated exemption from an emission limitation or standard may apply.

(ii) Identification of the data availability achieved during the reporting period, including a summary of the number and total duration of incidents that the monitoring protocol failed to perform in accordance with the design of the protocol or produced data that did not meet minimum data accuracy and precision requirements, classified by reason.

(iii) Identification of the compliance status as of the last day of the reporting period and whether compliance was continuous or intermittent during the reporting period.

(iv) If, pursuant to paragraph (b)(4)(iii) of this section, the owner or operator identifies any deviation as resulting from a known cause for which no Federally-approved or promulgated exemption from an

emission limitation or standard applies, the monitoring report shall also include all records that the source is required to maintain that pertain to the periods during which such deviation occurred and:

(A) The magnitude of each deviation;

(B) The reason for each deviation;

(C) A description of the corrective action taken for each deviation, including action taken to minimize each deviation and action taken to prevent recurrence; and

(D) All quality assurance activities performed on any element of the monitoring protocol.

(5) Each owner or operator that receives approval pursuant to §63.783(c) to use an add-on control system to control coating emissions shall maintain records of the occurrence and duration of each malfunction of operation ( *i.e.* , process equipment) or the required air pollution control and monitoring equipment. Each owner or operator shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with §63.783(b)(1), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(c) *Reporting requirements.* Before the 60th day following completion of each 6 month period after the compliance date specified in §63.784, each owner or operator of an affected source shall submit a report to the Administrator for each of the previous 6 months. The report shall include all of the information that must be retained pursuant to paragraphs (b)(2) through (3) of this section, except for that information specified in paragraphs (b)(2)(i) through (ii), (b)(2)(v), (b)(3)(i)(A), (b)(3)(ii)(A), and (b)(3)(iii)(A). If a violation at an affected source is detected, the owner or operator of the affected source shall also report the information specified in paragraph (b)(4) of this section for the reporting period during which the violation(s) occurred. To the extent possible, the report shall be organized according to the compliance procedure(s) followed each month by the affected source. If there was a malfunction during the reporting period, the report must also include the number, duration and a brief description of each malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.783(b)(1), including actions taken to correct a malfunction.

[60 FR 64336, Dec. 15, 1995, as amended at 61 FR 66227, Dec. 17, 1996; 76 FR 72069, Nov. 21, 2011]

### **§ 63.789 Implementation and enforcement.**

(a) This subpart can be implemented and enforced by the U.S. EPA, or a delegated authority such as the applicable State, local, or Tribal agency. If the U.S. EPA Administrator has delegated authority to a State, local, or Tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce this subpart. Contact the applicable U.S. EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to a State, local, or Tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or Tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator of U.S. EPA and cannot be transferred to the State, local, or Tribal agency.

(c) The authorities that cannot be delegated to State, local, or Tribal agencies are as specified in paragraphs (c)(1) through (4) of this section.

(1) Approval of alternatives to the requirements in §§63.780 through 63.781, and 63.783 through 63.784.

(2) Approval of major alternatives to test methods under §63.7(e)(2)(ii) and (f), as defined in §63.90, and as required in this subpart.

(3) Approval of major alternatives to monitoring under §63.8(f), as defined in §63.90, and as required in this subpart.

(4) Approval of major alternatives to recordkeeping and reporting under §63.10(f), as defined in §63.90, and as required in this subpart.

[68 FR 37353, June 23, 2003]

**Table 1 to Subpart II of Part 63—General Provisions of Applicability to Subpart II**

Reference	Applies to subpart II	Comment
63.1(a)(1)–(3)	Yes.	
63.1(a)(4)	Yes	Subpart II clarifies the applicability of each paragraph in subpart A to sources subject to subpart II.
63.1(a)(5)–(7)	Yes	
63.1(a)(8)	No	Discusses State programs.
63.1(a)(9)–(14)	Yes	
63.1(b)(1)	Yes	§63.781 specifies applicability in more detail.
63.1(b)(2)–(3)	Yes	
63.1(c)–(e)	Yes	
63.2	Yes	Additional terms are defined in §63.782; when overlap between subparts A and II occurs, subpart II takes precedence.
63.3	Yes	Other units used in subpart II are defined in that subpart.
63.4	Yes	
63.5(a)–(c)	Yes	
63.5(d)	Yes	Except information on control devices and control efficiencies should not be included in the application unless an add-on control system is or will be used to comply with subpart II in accordance with §63.783(c).
63.5(e)–(f)	Yes	
63.6(a)–(b)	Yes	
63.6(c)–(d)	Yes	Except §63.784(a) specifies the compliance date for existing affected sources.
63.6(e)(1)(i)	No	See §63.783(b)(1) for general duty requirement.
63.6(e)(1)(ii)	No.	
63.6(e)(1)(iii)	Yes.	
63.6(e)(2)	No	Section reserved.

Reference	Applies to subpart II	Comment
63.6(e)(3)	No.	
63.6(f)(1)	No.	
63.6(f)(2)–(f)(3)	No	If an alternative means of limiting emissions ( e.g. , an add-on control system) is used to comply with subpart II in accordance with §63.783(c), then this section does apply.
63.6(g)	No	§63.783(c) specifies procedures for application and approval of alternative means of limiting emissions.
63.6(h)	No	Subpart II does not contain any opacity or visible emission standards.
63.6(i)–(j)	Yes	
63.7(a)–(d)	No	If an alternative means of limiting emissions ( e.g. , an add-on control system) is used to comply with subpart II in accordance with §63.783(c), then these sections do apply.
63.7(e)(1)	No	If an alternative means of limiting emissions ( e.g. , an add-on control system) is used to comply with subpart II in accordance with §63.783(c), then see §63.786(e).
63.7(e)(2)–(e)(4)	No	If an alternative means of limiting emissions ( e.g. , an add-on control system) is used to comply with subpart II in accordance with §63.783(c), then these sections do apply.
63.8	No	If an alternative means of limiting emissions ( e.g. , an add-on control system) is used to comply with subpart II in accordance with §63.783(c), then this section does apply, with the exception of §63.8(c)(1)(i), §63.8(c)(1)(iii), and the last sentence of §63.8(d)(3).
63.9(a)–(d)	Yes	§63.787(a) extends the initial notification deadline to 180 days. §63.787(b) requires an implementation plan to be submitted with the initial notification.
63.9(e)	No	If an alternative means of limiting emissions (e.g., an add-on control system) is used to comply with subpart II in accordance with §63.783(c), then this paragraph does apply.
63.9(f)	No	Subpart II does not contain any opacity or visible emission standards
63.9(g)–(h)	No	If an alternative means of limiting emissions (e.g., an add-on control system) is used to comply with subpart II in accordance with §63.783(c) then these paragraphs do apply.
63.9(i)–(j)	Yes emsp; *	
63.10(a)	Yes.	
63.10(b)(1)	Yes.	
63.10(b)(2)(i)	No.	
63.10(b)(2)(ii)	No	See §63.788(b)(5) for recordkeeping of occurrence, duration, and actions taken during malfunctions.
63.10(b)(2)(iii)	Yes.	

Reference	Applies to subpart II	Comment
63.10(b)(2)(iv)–(b)(2)(v)	No.	
63.10(b)(2)(vi)–(b)(2)(xiv)	Yes.	
63.10(b)(3)	Yes.	
63.10(c)(1)–(9)	No	If an alternative means of limiting emissions ( e.g. , an add-on control system) is used to comply with subpart II in accordance with §63.783(c), then these sections do apply.
63.10(c)(10)–(11)	No	If an alternative means of limiting emissions ( e.g. , an add-on control system) is used to comply with subpart II in accordance with §63.783(c), then see §63.788(b)(5) for records of malfunctions.
63.10(c)(12)–(14)	No	If an alternative means of limiting emissions ( e.g. , an add-on control system) is used to comply with subpart II in accordance with §63.783(c), then these sections do apply.
63.10(c)(15)	No.	
63.10(d)(1)–(4)	Yes.	
63.10(d)(5)	No	See §63.788(c) for reporting malfunctions.
63.10(e)	No	If an alternative means of limiting emissions (e.g., an add-on control system) is used to comply with subpart II in accordance with §63.783(c), then this paragraph does apply.
63.10(f)	Yes	
63.11	No	If an alternative means of limiting emissions (e.g., an add-on control system) is used to comply with subpart II in accordance with §63.783(c), then this section does apply.
63.12–63.15	Yes	

[60 FR 64336, Dec. 15, 1995, as amended at 76 FR 72070, Nov. 21, 2011]

**Table 2 to Subpart II of Part 63—Volatile Organic HAP (VOHAP) Limits for Marine Coatings**

Coating category	VOHAP limits <sup>a,b,c</sup>		
	Grams/liter coating (minus water and exempt compounds)	Grams/liter solids <sup>d</sup>	
		t ≥4.5 °C	t <4.5 °C <sup>e</sup>
General use	340	571	728
Specialty:			
Air flask	340	571	728
Antenna	530	1,439	

Coating category	VOHAP limits <sup>a,b,c</sup>		
	Grams/liter coating (minus water and exempt compounds)	Grams/liter solids <sup>d</sup>	
		t ≥4.5 °C	t <4.5 °C <sup>e</sup>
Antifoulant	400	765	971
Heat resistant	420	841	1,069
High-gloss	420	841	1,069
High-temperature	500	1,237	1,597
Inorganic zinc high-build	340	571	728
Military exterior	340	571	728
Mist	610	2,235	
Navigational aids	550	1,597	
Nonskid	340	571	728
Nuclear	420	841	1,069
Organic zinc	360	630	802
Pretreatment wash primer	780	11,095	
Repair and maint. of thermoplastics	550	1,597	
Rubber camouflage	340	571	728
Sealant for thermal spray aluminum	610	2,235	
Special marking	490	1,178	
Specialty interior	340	571	728
Tack coat	610	2,235	
Undersea weapons systems	340	571	728
Weld-through precon. primer	650	2,885	

<sup>a</sup>The limits are expressed in two sets of equivalent units. Either set of limits may be used for the compliance procedure described in §63.785(c)(1), but only the limits expressed in units of g/L solids (nonvolatiles) shall be used for the compliance procedures described §63.785(c) (2) through (4).

<sup>b</sup>VOC (including exempt compounds listed as HAP) shall be used as a surrogate for VOHAP for those compliance procedures described in §63.785(c) (1) through (3).

<sup>c</sup>To convert from g/L to lb/gal, multiply by (3.785 L/gal)(1/453.6 lb/g) or 1/120. For compliance purposes, metric units define the standards.

<sup>d</sup>VOHAP limits expressed in units of mass of VOHAP per volume of solids were derived from the VOHAP limits expressed in units of mass of VOHAP per volume of coating assuming the coatings contain no water or exempt compounds and that the volumes of all components within a coating are additive.

<sup>e</sup>These limits apply during cold-weather time periods, as defined in §63.782. Cold-weather allowances are not given to coatings in categories that permit less than 40 percent volume solids (nonvolatiles). Such coatings are subject to the same limits regardless of weather conditions.

[60 FR 64336, Dec. 15, 1995, as amended at 61 FR 66228, Dec. 17, 1996; 76 FR 72070, Nov. 21, 2011]

**Table 3 to Subpart II of Part 63—Summary of Recordkeeping and Reporting Requirements<sup>abc</sup>**

Requirement	All Opts.		Option 1		Option 2		Option 3	
	Rec	Rep	Rec	Rep	Rec	Rep	Rec	Rep
Notification (§63.9(a)–(d))	X	X						
Implementation plan (§63.787(b)) <sup>d</sup>	X	X						
Volume of coating applied at unaffected major sources (§63.781(b))	X							
Volume of each low-usage-exempt coating applied at affected sources (§63.781(c))	X	X						
ID of the coatings used, their appropriate coating categories, and the applicable VOHAP limit	X	X						
Determination of whether containers meet the standards described in §63.783(b)(3)	X	X						
Results of M–24 or other approved tests	X	X						
Certification of the as-supplied VOC content of each batch	X							
Certification of the as-applied VOC content of each batch			X					
Volume of each coating applied			X	X				
Density of each thinner and volume fraction of solids in each batch					X	X		
Maximum allowable thinning ratio(s) for each batch					X	X	X	X
Volume used of each batch, as supplied					X	X	X	X
Total allowable volume of thinner					X	X	X	X
Actual volume of thinner used					X	X	X	X
Identification of each group of coatings and designated thinners							X	X

<sup>a</sup>Affected sources that comply with the cold-weather limits must record and report additional information, as specified in §63.788(b)(3) (ii)(C), (iii)(C), and (iv)(D).

<sup>b</sup>Affected sources that detect a violation must record and report additional information, as specified in §63.788(b)(4).

<sup>c</sup>OPTION 4: the recordkeeping and reporting requirements of Option 4 are identical to those of Options 1, 2, or 3, depending on whether and how thinners are used. However, when using Option 4, the term "VOHAP" shall be used in lieu of the term "VOC," and the owner or operator shall record and report the Administrator-approved VOHAP test method or certification procedure.

<sup>d</sup>Major sources that intend to become area sources by the compliance date may, in lieu of submitting an implementation plan, choose to submit a statement of intent as specified in §63.787(b)(4).

[60 FR 64336, Dec. 15, 1995, as amended at 76 FR 72071, Nov. 21, 2011]

## Appendix A to Subpart II of Part 63—VOC Data Sheet<sup>1</sup>

### *Properties of the Coating "As Supplied" by the Manufacturer<sup>2</sup>*

CoatingManufacturer: \_\_\_\_\_

CoatingIdentification: \_\_\_\_\_

Batch Identification: \_\_\_\_\_

Supplied To: \_\_\_\_\_

<sup>1</sup> Adapted from EPA-340/1-86-016 (July 1986), p. II-2.

<sup>2</sup> The subscript "s" denotes each value is for the coating "as supplied" by the manufacturer.

Properties of the coating as supplied<sup>1</sup> to the customer:

A. Coating Density:  $(D_c)_s$  \_\_\_ g/L

[ ] ASTM D1475-90\* [ ] Other<sup>3</sup>

B. Total Volatiles:  $(m_v)_s$  \_\_\_ Mass Percent

[ ] ASTM D2369-93 or 95\* [ ] Other<sup>3</sup>

C. Water Content: 1.  $(m_w)_s$  \_\_\_ Mass Percent

\*Incorporation by reference—see §63.14.

<sup>3</sup> Explain the other method used under "Remarks."

[ ] ASTM D3792-91\* [ ] ASTM D4017-81, 90, or 96a\* [ ] Other<sup>3</sup>

2.  $(v_w)_s$  \_\_\_ Volume Percent

[ ] Calculated [ ] Other<sup>3</sup>

D. Organic Volatiles:  $(m_o)_s$  \_\_\_ Mass Percent

E. Nonvolatiles:  $(v_n)_s$  \_\_\_ Volume Percent

[ ] Calculated [ ] Other<sup>3</sup>

F. VOC Content (VOC)<sub>s</sub>:

1. \_\_\_ g/L solids (nonvolatiles)
2. \_\_\_ g/L coating (less water and exempt compounds)

G. Thinner Density: D<sub>th</sub> \_\_\_ g/L

ASTM \_\_\_ [ ] Other<sup>3</sup>

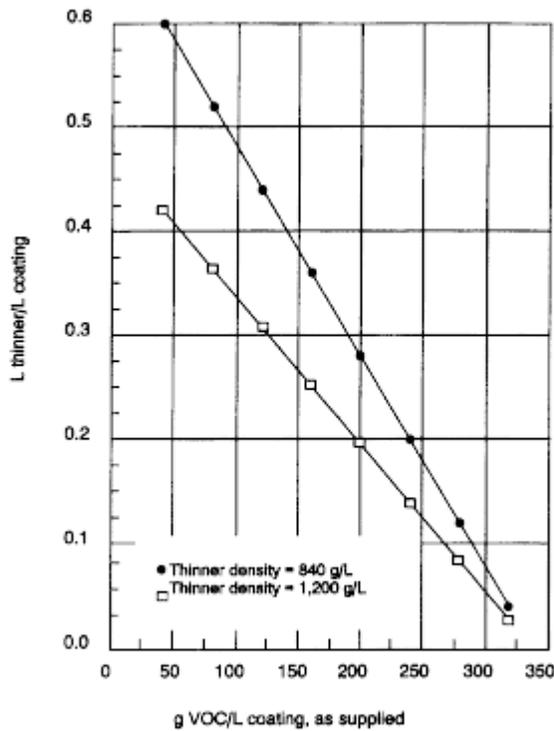
Remarks: (use reverse side)

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

[60 FR 64336, Dec. 15, 1995, as amended at 65 FR 62216, Oct. 17, 2000]

**Appendix B to Subpart II to Part 63—Maximum Allowable Thinning Rates as a Function of As Supplied VOC Content and Thinner Density**

Appendix B To Subpart II of Part 63 -- Maximum Allowable Thinning Rates As A Function Of As Supplied VOC Content And Thinner Density<sup>a,b</sup>



<sup>a</sup> These graphs represent maximum allowable thinning ratios for general use coatings without water or exempt compounds.

<sup>b</sup> The average density of the volatiles in the coating was assumed = 840 g solvent/L. solvent

# Indiana Department of Environmental Management Office of Air Quality

## Addendum to the Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

### Source Description and Location

Source Name:	Jeffboat, LLC
Source Location:	1030 E Market Street, Jeffersonville, IN 47130
County:	Clark
SIC Code:	3731
Permit Renewal No.:	T019-29304-00006
Permit Reviewer:	Laura Spriggs

### Public Notice Information

On October 8, 2011, the Office of Air Quality (OAQ) had a notice published in the *Evening News* in Jeffersonville, Indiana, stating that the Jeffboat, LLC had applied to renew its Part 70 Operating Permit for a for a shipbuilding and ship repair facility. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

### Comments Received

On November 4, 2011, the OAQ received comments from Kathy Moore of Keramida, Inc. on behalf of Jeffboat, LLC. The comments are summarized in the subsequent pages, with IDEM's corresponding responses.

IDEM does not amend the Technical Support Document (TSD). The TSD is maintained to document the original review. This addendum to the TSD is used to document responses to comments and changes made from the time the permit was drafted until a final decision is made.

The summary of the comments and IDEM, OAQ responses, including changes to the permit (language deleted is shown in ~~strikeout~~ and language added is shown in **bold**) are as follows:

#### Jeffboat Comment No. 1:

In the Technical Support Document, IDEM has determined that the emissions from the outdoor spray operations, the welding operations, the flame and plasma cutting operations, and the outdoor abrasive blasting operations are considered fugitive. Please add the language indicated in bold below to the emission unit descriptions in Sections A, D and E of the permit:

- (b) Surface coating operations consisting of the following:
  - (1) Two (2) spray booths, identified as EU-02, for the application of weld-through (shop) primer when performing shipbuilding, with a maximum capacity of 600 marine vessels per year, with emissions controlled by paint arrestor pads, identified as PA1 and PA2. Unit No. 1 was constructed in 1980. Unit No. 2 was

constructed in 1970. Under 40 CFR 63, Subpart II, this is considered a shipbuilding and repair operation.

- (2) Outdoor spray operations, identified as EU-03, constructed in 1939, consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications, with a maximum capacity of 600 marine vessels per year. A portion of the outdoor spray operations are conducted under cover that was installed in 2006. **Emissions from the outdoor spray operations are considered fugitive.** Under 40 CFR 63, Subpart II, this is considered a shipbuilding and repair operation.
- (c) Welding operations, identified as EU-04, occurring outside and under a structure, for the construction of marine vessels from sheet steel, constructed in 1939, with a maximum capacity of 600 marine vessels per year, and with emissions uncontrolled and exhausted to the atmosphere. **Emissions from the welding operations are considered fugitive.**
- (d) Flame and plasma cutting operations, identified as EU-05, occurring outside and under a structure, for the construction of marine vessels from sheet steel, with flame cutting operations installed in 1939 and plasma cutting operations installed in 1990, with a maximum capacity of 600 marine vessels per year, and with emissions uncontrolled and exhausted to the atmosphere. **Emissions from the flame and plasma operations are considered fugitive.**
- (e) Four (4) abrasive outdoor blasting units for the outdoor maintenance and construction of marine vessels, identified as EU-06, constructed in 2002, with a maximum capacity of 2.0 tons of blast media per hour, and with emissions controlled by a dust suppressant and exhausted to the atmosphere. **Emissions from the outdoor abrasive blasting operations are considered fugitive.**

#### **IDEM Response No. 1:**

As was indicated in the comment above, the Technical Support Document (TSD) provides a detailed discussion of the determination of fugitive emissions for operations at Jeffboat, LLC. This type of information is appropriate for the TSD as it is background/supporting documentation for the operations at Jeffboat, LLC. IDEM, OAQ does not agree that the requested statements should be included in the descriptive information in the permit as it is unnecessary information for the permit and it is adequately documented in the TSD.

No changes have been made to the permit as a result of this comment.

#### **Jeffboat Comment No. 2:**

Please revise Condition A.3 as described below to list only the insignificant activities that are specifically regulated in the Part 70 Operating Permit (language to be added shown in bold, language to be removed shown in ~~strikeout~~):

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

- (a) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4] [326 IAC 6-5]
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including the following:

- (1) Two (2) natural gas fired water-dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
  - (2) Two (2) natural gas fired pre-dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
  - (3) Two (2) natural gas fired dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
  - (4) Two (2) natural gas fired furnaces, with a maximum heat input capacity of 3.0 MMBtu/hr. [326 IAC 6.5-1]
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. [326 IAC 8-4-6]
- ~~(d) Machining where an aqueous cutting coolant continuously floods the machining interface.~~
- ~~(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.~~
- ~~(f) Purging of gas lines and vessels that is related to 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.~~
- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5] **[326 IAC 8-3-8]**

## IDEM Response No. 2:

IDEM, OAQ agrees to make the requested changes. The TSD documents all of the insignificant activities present at the source. If at any time, an insignificant activity becomes specifically regulated, the Permittee shall submit an application to have the insignificant activity and applicable requirement(s) added to the permit.

The permit has been revised as follows:

### A.3 **Specifically Regulated** Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]

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

- (a) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4] [326 IAC 6-5]
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including the following:
  - (1) Two (2) natural gas fired water-dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
  - (2) Two (2) natural gas fired pre-dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]

- (3) Two (2) natural gas fired dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
- (4) Two (2) natural gas fired furnaces, with a maximum heat input capacity of 3.0 MMBtu/hr. [326 IAC 6.5-1]
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. [326 IAC 8-4-6]
- ~~(d) Machining where an aqueous cutting coolant continuously floods the machining interface.~~
- ~~(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.~~
- ~~(f) Purging of gas lines and vessels that is related to 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.~~
- (gd) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5] **[326 IAC 8-3-8]**

**Jeffboat Comment No. 3:**

Condition D.1.9(b) currently states daily records shall be maintained of the pressure drop across baghouses BH1 and BH2; however, Condition D.1.6 only requires monitoring of the pressure drop across BH1; therefore, we request the following revisions to Condition D.1.9(b) Record Keeping Requirements (language to be removed shown in strikethrough):

**D.1.9 Record Keeping Requirements**

---

- ...
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain daily records of the pressure drop across the baghouses, BH1 ~~and BH2~~, controlling emissions from Pangborn (No. 1) ~~and Wheelabrator (No. 2)~~ shot blast units. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).
- ...

**IDEM Response No. 3:**

IDEM, OAQ agrees that the above change is appropriate.

The permit has been revised as follows:

**D.1.9 Record Keeping Requirements**

---

- (a) \* \* \*
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain daily records of the pressure drop across the baghouses, BH1 ~~and BH2~~, controlling emissions from **the** Pangborn (No. 1) ~~and Wheelabrator (No. 2)~~ shot blast units. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).

(c) \* \* \*  
(d) \* \* \*

**Jeffboat Comment No. 4:**

Condition D.2.4 specifies the requirements for 326 IAC 8-12-4, Shipbuilding or Ship Repair Operations in Clark, Floyd, Lake, or Porter Counties. Condition D.2.4(e) currently states the limits for weld-through (shop) preconstruction primer shall not exceed 5.65 pounds per gallon or the VOC content prescribed by U.S. EPA in 40 CFR 63, Subpart II, whichever is lower. We request the numerical limit listed in 40 CFR 63, Subpart II be included in Condition D.2.4(e) as follows for clarity (language to be added shown in bold):

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-12-4]

Pursuant to 326 IAC 8-12-4(a) (Shipbuilding or ship repair operations in Clark, Floyd, Lake, or Porter counties), VOC emissions from the No. 1 and No. 2 spray booths (EU-02) and the outdoor surface coating operations (EU-03) shall be limited as follows:

...

- (e) During the time between the date when the Permittee discontinues the use of the waterbased preconstruction primer and the date when the alternative control is installed, the weld-through (shop) preconstruction primer used by the Permittee shall not exceed a VOC content of five and sixty-five hundredths (5.65) pounds per gallon or the VOC content for weld-through (shop) preconstruction primer prescribed by the U.S. EPA in 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating), whichever is lower. **At the time of permit issuance, the VOC content limit for weld-through (shop) preconstruction primer prescribed by the U.S. EAP in 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating) is 650 grams per liter (minus water and exempt compounds) or 5.42 pounds per gallon (minus water and exempt compounds).**

**IDEM Response No. 4:**

IDEM, OAQ does not agree to make the above change. This information is not necessary content for the permit. The applicable provisions of 40 CFR 63, Subpart II are included in Section E.1 of the permit and the entire rule is included as Attachment B of the permit.

No changes have been made to the permit as a result of this comment.

**Jeffboat Comment No. 5:**

In Condition D2.6(b), language has been added to require the annual refresher training by May 1st of each year. It is not clear from the wording in the rule that the refresher training be conducted by May 1st of each year. Due to business demand and operational constraints, outside the control of Jeffboat, all of the annual refresher training may not be able to be completed between January 1st and May 1st; therefore, we request IDEM change the date to December 31, or in the alternative clarify that annual training must be done between May 1st and April 30th of the following year as indicated below:

D.2.6 Training Requirements [326 IAC 8-12-4]

Pursuant to 326 IAC 8-12-4(c), the Permittee shall comply with the following training requirements:

...

- (b) The Permittee shall provide annual refresher training prior to ~~May 1~~ **December 31** to any worker performing one (1) or more of the activities listed in 326 IAC 8-12-4(c)(3). Such training shall be appropriate to the job responsibilities of the worker.

...

**IDEM Response No. 5:**

IDEM, OAQ does not agree to make the above change. The Part 70 Operating Permit is required to include all applicable requirements. As discussed in the TSD, the provisions of 326 IAC 8-12 are applicable to the shipbuilding and ship repair facilities at Jeffboat, LLC. 326 IAC 8-12-4(c)(4) states:

"Beginning in 1997, the owner or operator shall provide annual refresher training prior to May 1 to any worker performing one (1) or more of the activities listed in subdivision (3). Such training shall be appropriate to the job responsibilities of the worker."

As indicated above, the requirement is that annual refresher training be completed between January 1 and April 30 each year. Since this is the applicable requirement, it is being incorporated into the permit as such. It is at the discretion of the Permittee to make a request to IDEM, OAQ for a rule revision or variance from the rule requirement.

No changes have been made to the permit as a result of this comment.

<b>Other Changes Since Public Notice</b>
--

Upon further review, the OAQ has decided to make the following revisions to the permit:

**Change No. 1:**

The applicable citation of 326 IAC 8-3-8 has been added to the descriptive information for the degreasing operations in Section D.6 of the permit.

The permit has been revised as follows:

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:
---

Insignificant Activities:
---------------------------

- |  |
|--|
| (dg) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5] <b>[326 IAC 8-3-8]</b> |
|--|

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)
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<b>Other Changes Since EPA Review</b>
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On November 16, 2011, the OAQ sent the Part 70 Operating Permit Renewal to the U.S. EPA for a 15-day review period. No comments were received from EPA during this timeframe; however, a change has been made to the permit as described below.

**Change No. 2:**

On November 21, 2011, the U.S. EPA published amendments to 40 CFR 63, Subpart II, National Emission Standards for Shipbuilding and Ship Repair (Surface Coating), in the Federal Register (76 FR 72049). The entire rule, as revised is included as Attachment B to the permit. The applicable provisions have been revised in Section E.1 of the permit as follows:

E.1.2 Shipbuilding and Ship Repair (Surface Coating) NESHAP [40 CFR 63, Subpart II][326 IAC 20-26]

The Permittee which engages in shipbuilding and ship repair is subject to the following provisions of 40 CFR 63, Subpart II, which is incorporated by reference as 326 IAC 20-26-1 (included as Attachment B of the permit):

- (1) 40 CFR 63.780;
- (2) 40 CFR 63.781**(a)-(c)**;
- (3) 40 CFR 63.782;
- (4) 40 CFR 63.783;
- (5) 40 CFR 63.784(a);
- (6) 40 CFR 63.785~~(a), (b), (c)(1)-(c)(3), (d)~~;
- (7) 40 CFR 63.786~~(a), (e), (d)~~;
- (8) 40 CFR 63.787;
- (9) 40 CFR 63.788**(a), (b)(1)-(b)(4), (c)**;
- (10) 40 CFR 63.789;
- (11) Table 1 to Subpart II of 40 CFR 63;
- (12) Table 2 to Subpart II of 40 CFR 63;
- (13) Table 3 to Subpart II of 40 CFR 63.

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

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

**Source Background and Description**

Source Name:	Jeffboat, LLC
Source Location:	1030 E Market Street, Jeffersonville, IN 47130
County:	Clark
SIC Code:	3731
Permit Renewal No.:	T019-29304-00006
Permit Reviewer:	Laura Spriggs

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Jeffboat, LLC relating to the operation of a stationary shipbuilding and repair facility. On May 26, 2010, Jeffboat, LLC submitted an application to the OAQ requesting to renew its operating permit. Jeffboat, LLC was issued its initial Part 70 Operating Permit, T019-6874-00006, on July 13, 1999 and its first Part 70 Operating Permit Renewal, T019-18066-00006, on March 23, 2006.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units:

- (a) Indoor shot blasting operations, identified as EU-01, with a maximum capacity of 600 marine vessels per year, consisting of:
  - (1) One (1) shot blast unit, known as Pangborn (No. 1), constructed in 1980, with a maximum airflow of 13,000 acfm, using steel shot, and exhausting to a baghouse dust collector identified as BH1.
  - (2) One (1) shot blast unit, known as Wheelabrator (No. 2), constructed in 1970, with a maximum airflow of 12,000 acfm, using steel shot, and exhausting to a baghouse dust collector identified as BH2.
- (b) Surface coating operations consisting of the following:
  - (1) Two (2) spray booths, identified as EU-02, for the application of weld-through (shop) primer when performing shipbuilding, with a maximum capacity of 600 marine vessels per year, with emissions controlled by paint arrestor pads, identified as PA1 and PA2. Unit No. 1 was constructed in 1980. Unit No. 2 was constructed in 1970. Under 40 CFR 63, Subpart II, this is considered a shipbuilding and repair operation.
  - (2) Outdoor spray operations, identified as EU-03, constructed in 1939, consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications, with a maximum capacity of 600 marine vessels per year. A portion of the outdoor spray operations are conducted under cover that was installed in 2006. Under 40 CFR 63, Subpart II, this is considered a shipbuilding and repair operation.
- (c) Welding operations, identified as EU-04, occurring outside and under a structure, for the construction of marine vessels from sheet steel, constructed in 1939, with a maximum

capacity of 600 marine vessels per year, and with emissions uncontrolled and exhausted to the atmosphere.

- (d) Flame and plasma cutting operations, identified as EU-05, occurring outside and under a structure, for the construction of marine vessels from sheet steel, with flame cutting operations installed in 1939 and plasma cutting operations installed in 1990, with a maximum capacity of 600 marine vessels per year, and with emissions uncontrolled and exhausted to the atmosphere.
- (e) Four (4) abrasive outdoor blasting units for the outdoor maintenance and construction of marine vessels, identified as EU-06, constructed in 2002, with a maximum capacity of 2.0 tons of blast media per hour, and with emissions controlled by a dust suppressant and exhausted to the atmosphere.

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

The following insignificant activity was included in the technical support document to the original Part 70 Operating Permit, but was not included in the first Part 70 Operating Permit Renewal. It is being incorporated in this permit renewal with the appropriate regulatory requirements.

- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

#### **Insignificant Activities**

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

- (a) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4] [326 IAC 6-5]
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including the following:
  - (1) Two (2) natural gas fired water-dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
  - (2) Two (2) natural gas fired pre-dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
  - (3) Two (2) natural gas fired dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
  - (4) Two (2) natural gas fired furnaces, with a maximum heat input capacity of 3.0 MMBtu/hr. [326 IAC 6.5-1]
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. [326 IAC 8-4-6]
- (d) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

- (f) Purging of gas lines and vessels that is related to 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.

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

The source has indicated that the following units have been removed:

- Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) British thermal units per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
- Wood-fired combustion sources with heat input equal to or less than one million (1,000,000) British thermal units per hour and not burning wood refuse, treated wood or chemically contaminated wood.

**Existing Approvals**

Since the issuance of the first Part 70 Operating Permit Renewal, T019-18066-00006, on March 23, 2006, the source has not received any additional approvals.

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

**Enforcement Issue**

There are no enforcement actions pending.

**Emission Calculations**

See Appendix A of this document for detailed emission calculations.

**County Attainment Status**

The source is located in Clark County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective July 19, 2007, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.

Pollutant	Designation
	<sup>1</sup> Attainment effective October 23, 2001, for the 1-hour ozone standard for the Louisville area, including Clark County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standard (NAAQS) for purposes of 40 CFR Part 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM <sub>2.5</sub> .

- (a) Ozone Standards  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Clark County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) PM<sub>2.5</sub>  
Clark County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011.. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Other Criteria Pollutants  
Clark County has been classified as attainment or unclassifiable in Indiana for SO<sub>2</sub>, CO, PM<sub>10</sub>, NO<sub>2</sub>, and lead. 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 (1) 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, Nonattainment NSR, and Part 70 Permit applicability.

#### **Discussion of Fugitive Emissions at Jeffboat, LLC**

Jeffboat, LLC operates a shipbuilding and ship repair facility along the Ohio River in Jeffersonville, Indiana. The operations consist primarily of manufacturing fresh water barges designed to transport large masses of various types of cargo across the waterways of the country. The manufacturing of the barges takes place on large amounts of land, with some of the operations occurring indoors, but the majority of the operations take place outdoors or in an open-ended structure. The types of operations include surface coating, shot blasting, cutting, and welding.

The EPA defines fugitive emissions as those emissions which could not reasonably pass through a stack, chimney, vent, or other functionally-equivalent opening. In general, emissions from surface coating and abrasive blasting activities are not considered fugitive emissions because they are often contained in a booth, building, or other type of enclosure and are often controlled in

some manner. However, when these types of operations are applied outdoors to large marine vessels, it may not be “reasonable” for these emissions to be controlled.

Supporting documentation for the Shipbuilding and Ship Repair MACT, promulgated in the mid-1990s, indicates that add-on controls are not technically or economically feasible for this industry. Based on a review of other state permits, no other sources control emissions with add-on control devices. VOC emissions are primarily controlled based on the standards in the MACT or similar state standards. Particulate emissions are controlled through work-practice standards and possibly shrouding or other portable enclosure.

Based on the scale of the operations at Jeffboat, LLC, as well as how other states are treating similar sources, IDEM, OAQ has determined that the outdoor operations at Jeffboat, LLC that cannot be reasonably performed indoors or within an enclosure where emissions could be reasonably captured, shall be treated as fugitive emissions. Jeffboat, LLC also conducts some welding and cutting operations in a large structure that was constructed decades ago for conducting manufacturing operations on the barge keels. This structure provides some shelter from the elements for the workers as well as allows for operations to be conducted when the weather does not permit work to be done unsheltered. The eastern end of the structure is open and an overhead crane is used to move the barge keels in and out of the structure. Some of the larger keels do not completely fit into the structure, so there may be portions of the keels inside and outside of the structure. Additionally, there are openings along the side of the structure to allow for the introduction of various equipment, supplies, and vehicles into the structure for use in the manufacturing process. Some of the equipment that comes through the side openings moves on a rail system, so the side openings cannot be reasonably closed off.

Due to the nature of the barge manufacturing operations occurring in the structure and the need for large openings, there is not a reasonable means of capturing the emissions and routing them through a stack, chimney, vent, or other functionally-equivalent opening. Therefore, emissions from the welding and cutting operations that are conducted within the structure have also been determined to be treated as fugitive emissions. It should be noted that this determination was arrived at based on a case-by-case evaluation and does not necessarily translate to structures at any other source.

Therefore, since the Shipbuilding and Ship Repair industry is not one (1) of the twenty-eight (28) listed source categories, the outdoor emissions and the emissions from welding and cutting occurring in the structure (particulate and VOC) do not count toward the determination of Part 70, PSD, Emission Offset, or Nonattainment NSR applicability. The emissions of hazardous air pollutants do count toward Part 70 applicability determination and any NSR HAPs count toward PSD, Emission Offset, and Nonattainment NSR applicability determination. Control measures for the fugitive particulate matter will be addressed through work practice standards as discussed in this technical support document.

Below is a summary of the emission units at Jeffboat, LLC and whether or not the particulate and VOC emissions will be counted as fugitive or non-fugitive.

Emission Unit	Fugitive/Non-Fugitive Particulate and VOC Emissions
Two (2) shot blast units (EU-01)	Non-Fugitive
Two (2) spray booths (EU-02)	Non-Fugitive
Outdoor spray operations (EU-03)	Fugitive

Emission Unit	Fugitive/Non-Fugitive Particulate and VOC Emissions
Welding operations (EU-04).	Fugitive
Flame and plasma cutting operations (EU-05)	Fugitive
Four (4) abrasive outdoor blasting units (EU-06)	Fugitive

*Note: There has not been a distinction made between welding and cutting occurring outdoors verses occurring in the structure since welding and cutting units are portable and may be operated both outside and in the structure.*

**Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	Greater than 250
PM <sub>10</sub>	Greater than 250
PM <sub>2.5</sub>	Greater than 250
SO <sub>2</sub>	Less than 100
VOC	Less than 100
CO	Less than 100
NO <sub>x</sub>	Less than 100
Single HAP	Greater than 10
Total HAP	Greater than 25

- (a) Appendix A of this TSD reflects the unrestricted potential emissions of the source.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 and PM2.5 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

**Actual Emissions**

The following table shows the actual emissions as reported by the source. This information reflects the 2008 OAQ emission data.

<b>Pollutant</b>	<b>Actual Emissions (tons/year)</b>
PM	204.5
PM <sub>10</sub>	204.5
SO <sub>2</sub>	--
VOC	197.1
CO	--
NO <sub>x</sub>	--
HAP	not reported

*Note: The emissions reported include emissions that are considered fugitive emissions, which are not counted for purposes of determination of Part 70, PSD, Emission Offset or Nonattainment NSR applicability.*

### **Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### **Potential to Emit After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, 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 Renewal (tons/year)									
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP	GHGs
EU-01: Pangborn Shot Blast Unit	39.7	39.7	39.7	--	--	--	--	23.79	23.79 (Mn)	--
EU-01: Wheelabrator Shot Blast Unit	39.7	39.7	39.7	--	--	--	--	21.96	21.96 (Mn)	--
EU-02: Spray Booth No. 1 for Weld-Through Primer	10	10	10	--	--	--	--	--	--	--
EU-02: Spray Booth No. 2 for Weld-Through Primer	10	10	10	--	--	--	--	--	--	--
Insignificant Activities										
Natural Gas Combustion Units (ovens and furnaces)	0.10	0.39	0.39	0.03	5.15	0.28	4.33	0.10	0.093 (hexane)	1246.01
Gasoline Dispensing Operation	--	--	--	--	--	*	--	*	*	--
Degreasing Operation	--	--	--	--	--	*	--	*	*	--
Fugitive Emissions <sup>1</sup>										
EU-03: Outdoor Spray Operations (fugitive)	432.2	432.2	432.2	--	--	391.7	--	120.9	99.1 (xylene)	--
EU-04: Welding Operations (fugitive)	40.2	40.2	40.2	--	--	--	--	34.5	21.22 (Mn cmpds)	6196.24
EU-05: Flame and Plasma Cutting (fugitive) <sup>2</sup>	93.8	93.8	93.8	--	--	--	--	0.35	0.28 (Mn cmpds)	*
EU-06: Four Abrasive Outdoor Blasting Units (fugitive)	1594.3	227.8	22.8	--	--	--	--	*	*	--
Paved and Unpaved Roads (fugitive)	*	*	*	--	--	--	--	--	--	--
<b>Total PTE of Entire Source**</b>	<b>99.5</b>	<b>99.8</b>	<b>99.8</b>	<b>0.03</b>	<b>5.15</b>	<b>&gt;0.28<sup>3</sup></b>	<b>4.33</b>	<b>&gt;25</b>	<b>&gt;10</b>	<b>&gt;7442.3<sup>3</sup></b>
PSD Major Source Thresholds	250	250	N/A	250	250	250	250	N/A	N/A	100,000 CO <sub>2</sub> e
Emission Offset/ Nonattainment NSR Major Source Thresholds	N/A	N/A	100	100	N/A	N/A	N/A	N/A	N/A	N/A
<p>*Not estimated  <sup>1</sup>Fugitive emissions are not counted toward the determination of PSD, Emission Offset, or Nonattainment NSR applicability and have not been included in the Total PTE of Entire Source calculation.  <sup>2</sup>Emissions taken from Part 70 Operating Permit Renewal No. T019-18066-00006  <sup>3</sup>Some of the emissions are not calculated; however, it is not expected that the total emissions will exceed 250 tons per year of VOC or 100,000 tons per year of CO<sub>2</sub>e.</p>										

- (a) This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year, emissions of GHGs are less than one hundred thousand (<100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year, and it is not in one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is not major for Nonattainment NSR because the emissions of the nonattainment pollutant, PM<sub>2.5</sub> (and the PM<sub>2.5</sub> precursor pollutant, SO<sub>2</sub>), are less than one hundred (<100) tons per year.

<b>Federal Rule Applicability</b>
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**Compliance Assurance Monitoring (CAM)**

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
  - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
  - (2) is subject to an emission limitation or standard for that pollutant; and
  - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

<b>Emission Unit / Pollutant</b>	<b>Control Device Used</b>	<b>Emission Limitation or Standard (Y/N)</b>	<b>Uncontrolled PTE (tons/year)</b>	<b>Controlled PTE (tons/year)</b>	<b>Major Source Threshold (tons/year)</b>	<b>CAM Applicable (Y/N)</b>	<b>Large Unit (Y/N)</b>
EU-01: Pangborn Shot Blast Unit / PM	BH	Y	1830	7.32	100	Y	N
EU-01: Wheelabrator Shot Blast Unit / PM	BH	Y	1689	6.76	100	Y	N
EU-01: Pangborn Shot Blast Unit / PM10	BH	Y	1574	6.30	100	Y	N
EU-01: Wheelabrator Shot Blast Unit / PM10	BH	Y	1453	5.81	100	Y	N
EU-01: Pangborn Shot Blast Unit / PM2.5	BH	Y	1574	15.74	100	Y	N

Emission Unit / Pollutant	Control Device Used	Emission Limitation or Standard (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
EU-01: Wheelabrator Shot Blast Unit / PM2.5	BH	Y	1453	14.53	100	Y	N
EU-02: Unit 1 Spray Booth for Weld-Through Primer / PM	Pad	Y	145.2	1.45	100	Y	N
EU-02: Unit 2 Spray Booth for Weld-Through Primer / PM	Pad	Y	145.2	1.45	100	Y	N
EU-02: Unit 1 Spray Booth for Weld-Through Primer / PM10	Pad	Y	145.2	1.45	100	Y	N
EU-02: Unit 2 Spray Booth for Weld-Through Primer / PM10	Pad	Y	145.2	1.45	100	Y	N
EU-02: Unit 1 Spray Booth for Weld-Through Primer / PM2.5	Pad	Y	145.2	1.45	100	Y	N
EU-02: Unit 2 Spray Booth for Weld-Through Primer / PM2.5	Pad	Y	145.2	1.45	100	Y	N

BH = baghouse, Pad = paint arrestor pad

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the EU-01 shotblast units (Pangborn and Wheelabrator) and the EU-02 spray booths (Units 1 and 2) for PM, PM10, and PM2.5. The Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

**New Source Performance Standards (NSPS)**

- (b) 40 CFR 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

The requirements of 40 CFR 60.40c, Subpart Dc, are not applicable to the combustion sources at Jeffboat, LLC because they all have heat input capacities of less than 10 MMBtu/hr.

- (c) 40 CFR 60, Subpart XX: Standards of Performance for Bulk Gasoline Terminals

The requirements of 40 CFR 60.500, Subpart XX, are not applicable to the gasoline fuel transfer and dispensing operation because it does not meet the definition of a bulk gasoline terminal pursuant to 40 CFR 60.501 because it does not have a throughput of greater than 75,700 liters per day.

### **National Emission Standards for Hazardous Air Pollutants (NESHAP)**

- (d) 40 CFR 63, Subpart R: National Emission Standards for Hazardous Air Pollutants for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)

The requirements of 40 CFR 63.420, Subpart R, are not applicable to the gasoline fuel transfer and dispensing operation because it does not meet the definition of a bulk gasoline terminal pursuant to 40 CFR 63.421 because it does not have a throughput of greater than 75,700 liters per day.

- (e) 40 CFR 63, Subpart T: National Emission Standards for Halogenated Solvent Cleaning

The requirements of 40 CFR 63.460, Subpart T, are not applicable to the Degreasing Operations because the solvent used does not contain the halogenated HAP solvents specified in 40 CFR 63.460(a).

- (f) 40 CFR 63, Subpart II: National Emission Standards for Hazardous Air Pollutants for Shipbuilding and Ship Repair (Surface Coating)

Jeffboat, LLC is subject to the National Emission Standards for Hazardous Air Pollutants for Shipbuilding and Ship Repair (Surface Coating), 40 CFR 63.780, Subpart II, which is incorporated by reference as 326 IAC 20-26, because Jeffboat, LLC engages in shipbuilding and ship repair operations and is a major source of hazardous air pollutants. The operations at Jeffboat, LLC are considered existing affected sources because a shipbuilding and repair surface coating affected source existed at this site prior to December 15, 1995. The Permittee was required to comply with the requirements of 40 CFR 63, Subpart II by December 15, 1997.

The specific units subject to the provisions of 40 CFR 63, Subpart II include:

- (1) Two (2) spray booths, identified as EU-02, for the application of weld-through (shop) primer when performing shipbuilding, with a maximum capacity of 600 marine vessels per year, with emissions controlled by paint arrestor pads, identified as PA1 and PA2. Unit No. 1 was constructed in 1980. Unit No. 2 was constructed in 1970.
- (2) Outdoor spray operations, identified as EU-03, constructed in 1939, consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications, with a maximum capacity of 600 marine vessels per year. A portion of the outdoor spray operations are conducted under cover that was installed in 2006.

The entire rule has been included as Attachment B to the permit. The surface coating operations are subject to the following portions of Subpart II:

- (1) 40 CFR 63.780;
- (2) 40 CFR 63.781;
- (3) 40 CFR 63.782;
- (4) 40 CFR 63.783;
- (5) 40 CFR 63.784(a);
- (6) 40 CFR 63.785(a), (b), (c)(1)-(c)(3), (d);
- (7) 40 CFR 63.786(a), (c), (d);
- (8) 40 CFR 63.787;
- (9) 40 CFR 63.788;
- (10) 40 CFR 63.789;

- (11) Table 1 to Subpart II of 40 CFR 63;
- (12) Table 2 to Subpart II of 40 CFR 63;
- (13) Table 3 to Subpart II of 40 CFR 63.

- (g) 40 CFR 63, Subpart MMMM: National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products

Pursuant to 40 CFR 63.3881(c)(12), 40 CFR 63, Subpart MMMM does not apply to surface coating of metal components of ships that meet the applicability criteria for shipbuilding and ship repair (40 CFR 63, Subpart II). Jeffboat, LLC has not conducted coating operations on metal parts besides those that are associated with shipbuilding and ship repair. Therefore, the provisions of 40 CFR 63, Subpart MMMM are not applicable to the facilities at Jeffboat, LLC.

- (h) 40 CFR 63, Subpart VVVV: National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing

The requirements of 40 CFR 63, Subpart VVVV, are not applicable to the operations at Jeffboat, LLC because they do not include resin and gel coat operations, carpet and fabric adhesive operations, or aluminum recreational boat surface coating operations.

<b>State Rule Applicability - Entire Source</b>
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**326 IAC 1-5-2 (Emergency Reduction Plans)**

The source is subject to 326 IAC 1-5-2.

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

This source was constructed in the 1860's and has operated under the current ownership since 1939. Since this type of operation is not one (1) of the twenty-eight (28) listed source categories and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter emissions are not counted toward determination of PSD applicability (see the discussion under the "Fugitive Emissions" section of this TSD). Based on this determination, the emissions from outdoor spray operations, welding operations, flame and plasma cutting operations, and outdoor blasting operations do not count toward the determination of PSD applicability.

Since the unrestricted potential to emit of non-fugitive PM and PM10 exceeds two hundred-fifty (250) tons per year for each, the Permittee has requested to limit emissions to below the PSD major source threshold. Emissions shall be limited as follows:

PM and PM10 emissions from EU-01 (Shot Blasting) and EU-02 (Spray Booths) shall be limited as follows:

Emission Unit	Control	PM Limit (lb/hr)	PM10 Limit (lb/hr)
EU-01: Pangborn Shot Blast Unit (No. 1)	Baghouse BH1	9.06	9.06
EU-01: Wheelabrator Shot Blast Unit (No. 2)	Baghouse BH2	9.06	9.06
EU-02: Unit 1 Spray Booth for Weld-Through Primer	Paint Arrestor Pad PA1	2.28	2.28

Emission Unit	Control	PM Limit (lb/hr)	PM10 Limit (lb/hr)
EU-02: Unit 2 Spray Booth for Weld-Through Primer	Paint Arrestor Pad PA2	2.28	2.28

Compliance with these limitations, in combination with the potential to emit from other units at the source, shall limit the potential to emit of PM and PM10 of the entire source to less than two hundred-fifty (250) tons per twelve (12) consecutive month period, each, and render 326 IAC 2-2 (PSD) not applicable to this source. Therefore, this source is a minor source under PSD.

*Note: These emission limitations are being incorporated into this Part 70 Operating Permit Renewal as Title I changes.*

**326 IAC 2-1.1-5 (Nonattainment New Source Review)**

Clark County has been designated as nonattainment for PM2.5. Since this source is not one (1) of twenty-eight (28) listed source categories and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter emissions are not counted toward determination of Nonattainment NSR applicability (see the discussion under the "Fugitive Emissions" section of this TSD). Based on this determination, the emissions from outdoor spray operations, welding operations, flame and plasma cutting operations, and outdoor blasting operations do not count toward the determination of Nonattainment New Source Review applicability.

Since the unrestricted potential to emit of PM2.5 of the entire source exceeds one hundred (100) tons per year, the Permittee has requested to limit emissions to below the Nonattainment NSR major source threshold. Emissions shall be limited as follows:

PM2.5 emissions from EU-01 (Shot Blasting) and EU-02 (Spray Booths) shall be limited as follows:

Emission Unit	Control	PM2.5 Limit (lb/hr)
EU-01: Pangborn Shot Blast Unit (No. 1)	Baghouse BH1	9.06
EU-01: Wheelabrator Shot Blast Unit (No. 2)	Baghouse BH2	9.06
EU-02: Unit 1 Spray Booth for Weld-Through Primer	Paint Arrestor Pad PA1	2.28
EU-02: Unit 2 Spray Booth for Weld-Through Primer	Paint Arrestor Pad PA2	2.28

Compliance with the these limitations, in combination with the potential to emit from other units at this source, shall limit the potential to emit PM2.5 of the entire source to less than one hundred (100) tons per twelve (12) consecutive month period and render 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable to this source. Therefore, this source is a minor source under Nonattainment NSR.

*Note: These emission limitations are being incorporated into this Part 70 Operating Permit Renewal as Title I changes.*

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

This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM10 is less than 250 tons per year; and the potential to emit of CO, NOx, and SO2 is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2012, and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

### **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

The operation of the shipbuilding and repair facility will emit greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 would apply to the source; however, with the exception of EU-06, all facilities were constructed prior to July 27, 1997. EU-06 does not itself have the potential to emit greater than ten (10) tons per year of a single HAP or twenty-five (25) tons per year of a combination of HAPs. Therefore, the provisions of 326 IAC 2-4.1 do not apply to any facilities at Jeffboat, LLC.

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

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2) because it is located in Jeffersonville Township of Clark County. The sources or facilities of opacity shall meet the following limitations:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period.
- (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.

### **326 IAC 6-4 (Fugitive Dust Emissions)**

Jeffboat, LLC is subject to 326 IAC 6-4 because it is a source of fugitive dust (the generation of particulate matter to the extent that some portion of the material escapes beyond the property line or boundary of the property, right-of-way, or easement on which the source is located).

Pursuant to 326 IAC 6-4-2, a source or sources generating fugitive dust shall be in violation of this rule (326 IAC 6-4) if any of the following criteria are violated:

- (1) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determined by the following formula:

$$P = \frac{100 * (R - U)}{U}$$

Where

P = Percentage increase

R = Number of particles of fugitive dust measured at downward receptor site

U = Number of particles of fugitive dust measured at upwind or background site

- (2) The fugitive dust is comprised of fifty percent (50%) or more respirable dust, then the percent increase of dust concentration in (1) above shall be modified as follows:

$$P_R = (1.5 \pm N) * P$$

Where

N = Fraction of fugitive dust that is respirable dust

$P_R$  = allowable percentage increase in dust concentration above background

P = no value greater than sixty-seven percent (67%)

- (3) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.
- (4) If fugitive dust is visible crossing the boundary or property line of a source. This subdivision may be refuted by factual data expressed in subdivisions (1), (2) or (3) of this section. 326 IAC 6-4-2(4) is not federally enforceable.

### **326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

Jeffboat is subject to 326 IAC 6-5 because it is a source of fugitive particulate matter emissions (particulate matter which is emitted from any source by means other than a stack) with potential fugitive particulate matter emissions of greater than twenty-five (25) tons per year, and it is located in Jeffersonville Township in Clark County.

The sources of fugitive particulate matter emissions include:

- (1) Outdoor spray operations (EU-03);
- (2) Welding operations (EU-04);
- (3) Flame and plasma cutting operations (EU-05);
- (4) Outdoor abrasive blasting operations (EU-06);
- (5) Paved and unpaved roads and parking lots.

Pursuant to 326 IAC 6-5-3(a), Jeffboat, LLC is required to submit a fugitive particulate matter emissions control plan. Pursuant to 326 IAC 6-5-5, the fugitive particulate matter emission control plan shall be in writing and shall include, at a minimum, the following information:

- (1) Name and address of the source.
- (2) Name and address of the owner or operator responsible for the execution of the control plan.
- (3) Identification of all processes, operations, and areas which have the potential to emit fugitive particulate matter in accordance with 326 IAC 6-5-4.
- (4) A map of the source showing aggregate pile areas, access areas around the aggregate pile, unpaved roads, paved roads, parking lots and location of conveyor and transfer points, etc.
- (5) The number and mix of vehicular activity occurring on paved roads, unpaved roads, and parking lots.
- (6) Type and quantity of material handled.
- (7) Equipment used to maintain aggregate piles.
- (8) A description of the measures to be implemented to control fugitive particulate matter emissions resulting from emission points identified in subdivision (3).

- (9) A specification of the dust suppressant material, such as oil or chemical including the estimated frequency of application rates and concentrations.
- (10) A specification of the particulate matter collection equipment used as a fugitive particulate matter emission control measure.
- (11) A schedule of compliance with the provisions of the control plan. Such schedule shall specify the amount of time the source requires to award any necessary contracts, commence and complete construction, installation, or modification of the fugitive particulate matter emission control measures.
- (12) Other relevant data that may be requested by the commissioner, to evaluate the effectiveness of the control plan.

Records shall be kept and maintained which document all control measures and activities to be implemented in accordance with the approved control plan. Said records shall be available upon the request of the commissioner, and shall be retained for three (3) years.

Attachment A to the Part 70 Operating Permit contains the fugitive particulate matter emissions control plan and a site map for emissions from paved roads and parking lots, unpaved roads and parking lots, and unpaved open material storage areas. Control measures for the outdoor spray coating operations, the welding operations, the flame and plasma cutting operations, and the outdoor abrasive blasting operations are included within the D Sections of the permit and are specified in the next section of this TSD.

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

Pursuant to 326 IAC 6.5-1-1(a)(2), Jeffboat, LLC shall comply with the emission limitations in 326 IAC 6.5-1-2 because it is located in Clark County, it does not have limitations specified in 326 IAC 6.5-2 and has the potential to emit 100 tons or more or actual emissions of 10 tons or more of particulate matter per year. Specific emission limitations are discussed for each facility in the following sections.

**326 IAC 6.5-2 (Particulate Matter Limitations – Clark County)**

The provisions of 326 IAC 6.5-2 do not apply to any facilities at Jeffboat, LLC because this source is not specifically listed.

**State Rule Applicability – Individual Facilities**

**EU-01: Pangborn (No. 1) and Wheelabrator (No. 2) Shot Blast Units**

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

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the EU-01 shot blast units, consisting of Pangborn (No. 1) and Wheelabrator (No. 2), shall not exceed 0.03 grains per dry standard cubic foot.

Emission Unit	Uncontrolled PM (lb/hr)	Controlled PM (lb/hr)	Air Flow (acfm)	326 IAC 6.5-1 Allowable PM Emissions (lb/hr)
Pangborn (No. 1)	417.9	1.67	13,000	3.34
Wheelabrator (No. 2)	385.7	1.54	12,000	3.09
326 IAC 6.5-1 Allowable PM Emissions (lb/hr) = Air Flow (scfm) x 0.03 gr/dscf x (1 lb/7000 gr) x (60 min/hr)				

The shot blast units are capable of complying with the 326 IAC 6.5-1 allowable PM emissions after control. Therefore, the baghouse dust collectors (BH1 and BH2) must be in operation and control emissions from the shot blast units at all times the shot blast units are in operation.

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

Pursuant to 326 IAC 6-3-1(c), 326 IAC 6-3 does not apply if a particulate matter emission limitation established in 326 IAC 6.5 is more stringent than the particulate matter emission limitation established in 326 IAC 6-3.

The emission limitations for the EU-01 shot blast units pursuant to 326 IAC 6-3-2 would be as follows:

Emission Unit	Process Weight Rate* (ton/hr)	326 IAC 6-3-2 Allowable PM Emissions (lb/hr)	326 IAC 6.5-1 Allowable PM Emissions (lb/hr)
Pangborn (No. 1)	11.13	20.6	3.34
Wheelabrator (No. 2)	11.13	20.6	3.09

*\*Process Weight Rate was estimated from 600 vessels being equivalent to 195,000 tons of steel per year and each unit handling 300 vessels per year.*

These limitations are based upon the following:

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

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

The PM emission limitation established in 326 IAC 6.5-1 is more stringent than the PM emission limitation established in 326 IAC 6-3 for the EU-01 shot blast units; therefore 326 IAC 6-3 does not apply to the EU-01 shot blast units.

**EU-02 and EU-03: Spray Booths No. 1 and No. 2 (EU-02) and Outdoor Spray Operations (EU-03)**

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

(a) Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the EU-02 spray booths (No. 1 and No. 2) shall not exceed 0.03 grains per dry standard cubic foot.

Emission Unit	Uncontrolled PM (lb/hr)	Controlled PM (lb/hr)	Air Flow (scfm)	326 IAC 6.5-1 Allowable PM Emissions (lb/hr)
Spray Booth No. 1	33.16	0.33	5,000*	1.29
Spray Booth No. 2	33.16	0.33	8,000*	2.06
326 IAC 6.5-1 Allowable PM Emissions (lb/hr) = Air Flow (scfm) x 0.03 gr/dscf x (1 lb/7000 gr) x (60 min/hr)				

*\*The airflows are based on the original Part 70 Operating Permit application.*

The spray booth units are capable of complying with the 326 IAC 6.5-1 allowable PM emissions after control. Therefore, the paint arrestor pads (PA1 and PA2) must be in operation and control emissions from the paint booths at all times the paint booths are in operation.

(b) The outdoor spray operations (EU-03) have been determined to be fugitive emissions (see the "Fugitive Emissions" section of this TSD). 326 IAC 6.5-1 does not apply to fugitive

emissions. Therefore, the outdoor spray operations (EU-03) are not subject to the provisions of 326 IAC 6.5-1.

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

- (a) Pursuant to 326 IAC 6-3-1(c), 326 IAC 6-3 does not apply if a particulate matter emission limitation established in 326 IAC 6.5 is more stringent than the particulate matter emission limitation established in 326 IAC 6-3. Pursuant to 326 IAC 6-3-2(d), the requirement for surface coating manufacturing processes is control by a dry particulate filter, waterwash, or equivalent control device.

The PM emission limitation established in 326 IAC 6.5-1 is more stringent than particulate standard required in 326 IAC 6-3 for the EU-02 paint booths; therefore 326 IAC 6-3 does not apply to the EU-02 paint booths.

- (b) The outdoor spray operations (EU-03) have been determined to be fugitive emissions; however, IDEM, OAQ does apply the requirements of 326 IAC 6-3 to sources of fugitive emissions that are manufacturing processes and that are not otherwise exempt from the rule. Since 326 IAC 6.5-1 is not applied to fugitive emissions, there is not a more stringent particulate emission limitation applicable to the outdoor spray operations (EU-03) under 326 IAC 6.5-1. Therefore, 326 IAC 6-3 is applicable to the outdoor spray operations (EU-03).

The EU-03 operation consists of surface coating using brush, roller, and spray application. Pursuant to 326 IAC 6-3-1(b)(6) and (8), brush and roll applications of surface coating are exempt from the requirements of 326 IAC 6-3. Pursuant to 326 IAC 6-3-2(d), the spray application surface coating manufacturing processes shall be controlled by dry particulate filter, waterwash, or equivalent control device and the source shall operate the control device in accordance with the manufacturer's recommendation.

Since a control device is not practical for controlling particulate emissions from the outdoor spray operations (EU-03) for coating marine vessels, IDEM, OAQ has determined that the following work practice standards shall satisfy compliance with 326 IAC 6-3-2(d):

- (1) Surface coating operations shall be conducted in such a manner that all particulate matter (drift or over spray) remains on the source's property.
- (2) Surface coating with spray application shall be limited to times when the wind velocity and direction does not cause overspray to cross the property line.
- (3) Surface coating with spray application shall be conducted with the use of containment methods such as curtains or shrouds where practical and possible.
- (4) Surface coating of flat horizontal surfaces of vessels shall be accomplished by rolling or brushing when practical.

**326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

- (a) The requirements of 326 IAC 6-5 are not applicable to the EU-02 spray booths because these emission units are not sources of fugitive particulate matter emissions.
- (b) The outdoor spray operations (EU-03) are considered a source of fugitive particulate matter emissions and are subject to 326 IAC 6-5 as discussed in the "State Rule Applicability – Entire Source" section of this TSD. The work practice standards established for compliance with 326 IAC 6-3-2(d) shall also satisfy the requirement for control measures for the outdoor spray operations (EU-03) under 326 IAC 6-5. No additional control measures need to be identified in the fugitive particulate matter emissions control plan for EU-03.

**326 IAC 8-1-6 (New Facilities; General Reduction Requirements)**

The provisions of 326 IAC 8-1-6 apply to new facilities as of January 1, 1980 that have potential emissions of twenty-five (25) tons or more per year of VOC; are located anywhere in the state; and that are not otherwise regulated by other provisions of article 8, 326 IAC 20-48, or 326 IAC 20-56. The spray booths (EU-02) and outdoor coating operations (EU-03) are subject to 326 IAC 8-12; therefore, the provisions of 326 IAC 8-1-6 are not applicable to the spray booths (EU-02) or the outdoor coating operations (EU-03).

**326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)**

Pursuant to 326 IAC 8-2-9(b)(2), the provisions of 326 IAC 8-2-9 are not applicable to the surface coating of the exterior of marine vessels. Additionally, the EU-02 and EU-03 surface coating operations are subject to 326 IAC 8-12. Therefore, the provisions of 326 IAC 8-2-9 are not applicable to the spray booths (EU-02) or the outdoor spray operations (EU-03).

**326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)**

The provisions of 326 IAC 8-7 apply to stationary sources located in Lake, Porter, Clark, or Floyd Counties that have the potential to emit or emit VOC at levels greater than twenty-five (25) tons per year in Lake and Porter Counties or one hundred (100) tons per year in Clark or Floyd Counties. The provisions also apply for sources that have coating facilities which emit or have the potential to emit equal to or greater than ten (10) tons per year of VOCs in Lake, Porter, Clark, or Floyd Counties. Pursuant to 326 IAC 8-7-2(a)(3)(O), the VOC emissions from ship building and ship repair are excluded from the total VOC emissions when determining whether the applicability thresholds of this rule are exceeded. The potential VOC emissions from Jeffboat, LLC, excluding those from ship building and ship repair, are less than ten (10) tons per year. Therefore, the provisions of 326 IAC 8-7 are not applicable to Jeffboat, LLC.

**326 IAC 8-12 (Shipbuilding or Ship Repair Operations in Clark, Floyd, Lake, or Porter Counties)**

Jeffboat, LLC is subject to the provisions of 326 IAC 8-12 because it consists of shipbuilding and ship repair facilities that are located in Clark County and it has the potential to emit a total of one hundred (100) tons or more per year of VOC from all operations at the source. The following are the applicable requirements of this rule:

VOC Limitations

Pursuant to 326 IAC 8-12-4(a), VOC emissions from the spray booths (EU-02) and the outdoor surface coating operations (EU-03) shall be limited as follows:

- (a) During application of specialty coatings, VOC emissions shall be limited throughout the year as follows:
  - (1) Special marking coatings shall not exceed a VOC content of four and eight-hundredths (4.08) pounds per gallon.
  - (2) Heat resistant and high-gloss coatings shall not exceed a VOC content of three and fifty-hundredths (3.50) pounds per gallon.
  - (3) High-temperature coatings shall not exceed a VOC content of four and seventeen-hundredths (4.17) pounds per gallon.
  - (4) Any other specialty coating shall not exceed a VOC content of two and eighty-three hundredths (2.83) pounds per gallon.
- (b) During application of any general use coating, VOC emissions shall be limited as follows:

- (1) The VOC content of any general use coating shall not exceed two and eighty-three hundredths (2.83) pounds per gallon, as applied.
  - (2) From May 1 through September 30, no thinner shall be added to any general use coating.
- (c) During application of any weld-through (shop) preconstruction primer, VOC emissions shall be limited throughout the year as follows:
- (1) Waterbased weld-through (shop) preconstruction primer shall be used.
  - (2) The VOC content of weld-through (shop) preconstruction primer, as applied, shall not exceed zero (0).
  - (3) No VOC containing cleaning material shall be used in the primer application facility.
  - (4) No VOC containing thinner shall be added to the weld-through (shop) preconstruction primer.
- (d) If the Permittee determines that a waterbased weld-through (shop) preconstruction primer can no longer be used due to an operational, performance, or availability constraint associated with the waterbased weld-through (shop) preconstruction primer, the Permittee shall do the following:
- (1) Notify the department within seven (7) days of discontinuing use of the waterbased weld-through (shop) preconstruction primer.
  - (2) Submit to the department for approval a plan for an alternative control within sixty (60) days of discontinuance. The alternative control shall consist of one (1) of the following:
    - (A) A waterbased weld-through (shop) preconstruction primer.
    - (B) A control system with a minimum overall VOC emissions reduction efficiency of ninety-five percent (95%) that is subject to each of the following requirements:
      - (i) The operation, maintenance, and testing requirements of 326 IAC 8-7-9.
      - (ii) The monitoring, record keeping, and reporting requirements of 326 IAC 8-7-10.
  - (3) Install the alternative control within nine (9) months of approval by the department of the plan required in clause 326 IAC 8-12-4(a)(4)(B).
- (e) During the time between the date when the Permittee discontinues the use of the waterbased preconstruction primer and the date when the alternative control is installed, the weld-through (shop) preconstruction primer used by the Permittee shall not exceed a VOC content of five and sixty-five hundredths (5.65) pounds per gallon or the VOC content for weld-through (shop) preconstruction primer prescribed by the U.S. EPA in 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating), whichever is lower.

#### Work Practice Standards

Pursuant to 326 IAC 8-12-4(b), the Permittee shall comply with the following work practice standards:

- (a) Cleaning accessories, such as, but not limited to, paper, cloth, and rags that have been used for cleaning surfaces and equipment and that contain cleaning materials shall be stored in normally closed gasket sealed containers.
- (b) VOC-containing solvents and coatings shall be stored in normally closed sealed containers prior to use. Spent VOC-containing solvents and coatings shall be stored in normally closed gasket sealed containers.
- (c) Cleaning materials for cleaning spray equipment, including paint lines, shall not be used unless the equipment for collecting the cleaning materials and minimizing its evaporation to the atmosphere is used.
- (d) All handling and transfer of VOC-containing materials to and from containers, tanks, vats, drums, and piping systems shall be conducted in a manner that minimizes drips and spills, and any drips and spills shall be cleaned up promptly.
- (e) All containers, tanks, vats, drums, and piping systems shall be free of cracks, holes and other defects and must be closed unless materials are being added to or removed from them.

#### Training Requirements

Pursuant to 326 IAC 8-12-4(c), the Permittee shall comply with the following training requirements:

- (a) The training program may include training provided by the manufacturer or supplier of coatings, cleaning materials, or the application equipment thereof, and shall include written procedures, hands-on demonstration, as appropriate, and certification by the trainer of the trainee's ability to perform the task, on the following activities:
  - (1) Identification of appropriate coatings or cleaning materials.
  - (2) Preparation of coatings or cleaning materials according to coating or cleaning material manufacturer, distributor, or owner or operator's recommendations.
  - (3) Application of coatings or cleaning materials, or organic solvents using techniques that minimize their usage.
  - (4) Procedures to clean spray guns to minimize evaporation of organic solvents to the atmosphere.
  - (5) Work practice standards established in 326 IAC 8-12-4(b).
  - (6) Procedures to gather, record, monitor, and report data in accordance with 40 CFR 63.787 and 40 CFR 63.788.
- (b) The Permittee shall provide annual refresher training prior to May 1 to any worker performing one (1) or more of the activities listed in 326 IAC 8-12-4(c)(3). Such training shall be appropriate to the job responsibilities of the worker.
- (c) Any worker may perform one (1) or more activities listed in 326 IAC 8-12-4(c)(3), for not more than one hundred eighty (180) days, notwithstanding the requirement of 326 IAC 8-12-4(c)(2), provided:

- (1) such untrained worker works under the supervision of a worker who meets the training requirements of 326 IAC 8-12-4(c)(2); and
- (2) the Permittee keeps records of:
  - (A) The date the worker was assigned to the activity;
  - (B) The date training was completed; and
  - (C) The name of the worker providing the supervision.
- (d) The Permittee shall keep records of the training program. The records shall consist of the following:
  - (1) The date training was completed.
  - (2) A list of workers by name and worker activities listed in 326 IAC 8-12-4(c)(3) in which each worker has been trained.
  - (3) A statement signed by the person providing the training certifying that the worker completed training and is proficient in the activities listed in 326 IAC 8-12-4(c)(3) in which the worker will be engaged.

#### **Welding Operations (EU-04)**

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

The welding operations (EU-04) have been determined to be fugitive emissions (see the "Fugitive Emissions" section of this TSD. 326 IAC 6.5-1 does not apply to fugitive emissions. Therefore, the welding operations (EU-04) are not subject to the provisions of 326 IAC 6.5-1.

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

The welding operations (EU-04) have been determined to be fugitive emissions; however, IDEM, OAQ does apply the requirements of 326 IAC 6-3 to sources of fugitive emissions that are manufacturing processes and that are not otherwise exempt from the rule. Since 326 IAC 6.5-1 is not applied to fugitive emissions, there is not a more stringent particulate emission limitation applicable to the welding operations (EU-04). Therefore, 326 IAC 6-3 is applicable to the welding operations (EU-04).

The particulate emissions from the welding operations (EU-04) shall not exceed 32.78 pounds per hour when operating at a maximum process weight rate of 22.26 tons per hour\*.

*\*Process Weight Rate was estimated from 600 vessels being equivalent to 195,000 tons of steel per year.*

These limitations are based upon the following:

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

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

##### **326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

The welding operations (EU-04) are considered a source of fugitive particulate matter emissions and are subject to 326 IAC 6-5 as discussed in the "State Rule Applicability – Entire Source"

section of this TSD. The following work practice standards shall satisfy the requirement for control measures for the welding operations (EU-04) as required under 326 IAC 6-5:

- (1) Welding operations shall be conducted in such a manner that all particulate matter remains on the source's property.
- (2) Welding operations shall be conducted with the use of containment methods such as curtains or shrouds where practical and possible.
- (3) The surfaces to be welded shall be kept clean of oils and grease.
- (4) Welding shall be conducted using the lowest recommended current and voltage that will provide quality welds.
- (5) Cleanup from welding operations shall be performed through wet cleaning methods or vacuums equipped with appropriate filters.
- (6) Welders shall be trained on operating techniques and procedures to reduce welding fumes and fugitive emissions.

### **Flame and Plasma Cutting Operations (EU-05)**

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

The flame and plasma cutting operations (EU-05) have been determined to be fugitive emissions (see the "Fugitive Emissions" section of this TSD. 326 IAC 6.5-1 does not apply to fugitive emissions. Therefore, the flame and plasma cutting operations (EU-05) are not subject to the provisions of 326 IAC 6.5-1.

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

The flame and plasma cutting operations (EU-05) have been determined to be fugitive emissions; however, IDEM, OAQ does apply the requirements of 326 IAC 6-3 to sources of fugitive emissions that are manufacturing processes and that are not otherwise exempt from the rule. Since 326 IAC 6.5-1 is not applied to fugitive emissions, there is not a more stringent particulate emission limitation applicable to the flame and plasma cutting operations (EU-05). Therefore, 326 IAC 6-3 is applicable to the flame and plasma cutting operations (EU-05).

The particulate emissions from the flame and plasma cutting operations (EU-05) shall not exceed 32.78 pounds per hour when operating at a maximum process weight rate of 22.26 tons per hour\*.

*\*Process Weight Rate was estimated from 600 vessels being equivalent to 195,000 tons of steel per year.*

These limitations are based upon the following:

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

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

#### **326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

The flame and plasma cutting operations (EU-05) are considered a source of fugitive particulate matter emissions and are subject to 326 IAC 6-5 as discussed in the "State Rule Applicability – Entire Source" section of this TSD. The following work practice standards shall satisfy the requirement for control measures for the flame and plasma cutting operations (EU-05) as required under 326 IAC 6-5:

- (1) Cutting operations shall be conducted in such a manner that all particulate matter remains on the source's property.
- (2) Cutting operations shall be conducted with the use of containment methods such as curtains or shrouds where practical and possible.
- (3) The surfaces to be cut shall be kept clean of oils and grease.
- (4) Cutting shall be conducted using lower recommended cutting speeds to minimize emissions.
- (5) Cleanup from cutting operations shall be performed through wet cleaning methods or vacuums equipped with appropriate filters.
- (6) Cutting operators shall be trained on operating techniques and procedures to reduce fugitive emissions from cutting operations.

### **Outdoor Abrasive Blasting Operations (EU-06)**

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

The outdoor abrasive blasting operations (EU-06) have been determined to be fugitive emissions (see the "Fugitive Emissions" section of this TSD. 326 IAC 6.5-1 does not apply to fugitive emissions. Therefore, the outdoor abrasive blasting operations (EU-06) are not subject to the provisions of 326 IAC 6.5-1.

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

The outdoor abrasive blasting operations (EU-06) have been determined to be fugitive emissions; however, IDEM, OAQ does apply the requirements of 326 IAC 6-3 to sources of fugitive emissions that are manufacturing processes and that are not otherwise exempt from the rule. Since 326 IAC 6.5-1 is not applied to fugitive emissions, there is not a more stringent particulate emission limitation applicable to the outdoor abrasive blasting operations (EU-06). Therefore, 326 IAC 6-3 is applicable to the outdoor abrasive blasting (EU-06).

The particulate emissions from the outdoor abrasive blasting operations (EU-06) shall not exceed 32.78 pounds per hour when operating at a maximum process weight rate of 22.26 tons per hour\*.

*\*Process Weight Rate was estimated from 600 vessels being equivalent to 195,000 tons of steel per year.*

This limitation is based upon the following:

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

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

#### **326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

The outdoor abrasive blasting operations (EU-06) are considered a source of fugitive particulate matter emissions and are subject to 326 IAC 6-5 as discussed in the "State Rule Applicability – Entire Source" section of this TSD. The following work practice standards shall satisfy the requirement for control measures for the outdoor abrasive blasting operations (EU-06) as required under 326 IAC 6-5:

- (1) Outdoor abrasive blasting operations shall be conducted in such a manner that all particulate matter remains on the source's property.
- (2) Outdoor abrasive blasting operations shall be conducted with the use of containment methods such as curtains or shrouds where practical and possible.
- (3) The use of a dust suppressant additive or water injection shall be employed whenever the outdoor abrasive blasting units are in operation.
- (4) Blast media shall be stored in a manner to prevent it from escaping into the atmosphere via wind erosion.
- (5) Cleanup from outdoor abrasive blasting operations shall be performed through wet cleaning methods or vacuums equipped with appropriate filters.
- (6) Outdoor abrasive blasting operators shall be trained on operating techniques and procedures to reduce fugitive emissions from outdoor abrasive blasting operations.

### **Insignificant Activities - Paved and Unpaved Roads**

#### **326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

The paved and unpaved roads are considered a source of fugitive particulate matter emissions and are subject to 326 IAC 6-5 as discussed in the "State Rule Applicability – Entire Source" section of this TSD. Pursuant to 326 IAC 6-5-4(a), for paved roads, unpaved roads, and parking lots, sources may use one or more of the following measures:

- (a) Paved roads and parking lots:
  - (1) Cleaning by vacuum sweeping
  - (2) Flushing
  - (3) An equivalent alternate measure
- (b) Unpaved roads and parking lots:
  - (1) Paving with a material such as asphalt or concrete
  - (2) Treating with a suitable and effective oil or chemical dust suppressant approved by the commissioner. The frequency of application shall be on an as needed basis.
  - (3) Spraying with water, the frequency of application shall be on an as needed basis.
  - (4) Double chip and seal the road surface and maintain on an as needed basis.
  - (5) An equivalent alternate measure.

### **Insignificant Activities - Natural Gas Combustion**

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

The two (2) natural gas fired furnaces, the two (2) natural gas fired water-dry ovens, the two (2) natural gas fired pre-dry ovens, and the two (2) natural gas fired dry ovens do not meet the definition of fuel combustion steam generators pursuant to 326 IAC 6.5-1-1.5(b)(3). Therefore,

pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from each of the ovens shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

### **Insignificant Activities - Gasoline Dispensing Facilities**

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

The gasoline fuel transfer and dispensing operation is subject to the provisions of 326 IAC 8-4-6 because it is located in Clark County and it meets the definition of a gasoline dispensing facility because gasoline is dispensed into motor vehicle fuel tanks or portable containers from a storage tank with a capacity of two hundred fifty (250) gallons or more.

- (a) Pursuant to 326 IAC 8-4-6(b), the Stage I vapor recovery system requirements at the gasoline dispensing facility are as follows:
  - (1) No owner or operator of a gasoline dispensing facility shall allow the transfer of gasoline between any transport and any storage tank unless the tank is equipped with the following:
    - (A) A submerged fill pipe that extends to not more than:
      - (i) twelve (12) inches from the bottom of the storage tank if the fill pipe was installed on or before November 9, 2006; or
      - (ii) six (6) inches from the bottom of the storage tank if the fill pipe was installed after November 9, 2006.
    - (B) Either a pressure relief valve set to release at not less than seven-tenths (0.7) pounds per square inch or an orifice of five-tenths (0.5) inch in diameter.
    - (C) A vapor balance system connected between the tank and the transport, operating according to manufacturer's specifications.
  - (2) If the owner or employees of the owner of a gasoline dispensing facility are not present during loading, it shall be the responsibility of the owner or the operator of the transport to make certain the vapor balance system is:
    - (A) connected between the transport and the storage tank; and
    - (B) operating according to manufacturer's specifications.
- (b) The provisions of 326 IAC 8-4-6(c) are not applicable to the gasoline dispensing facility because the facility dispenses an average monthly volume of less than 10,000 gallons.

### **Insignificant Activities - Degreasing Operations**

#### **326 IAC 8-3 (Organic Solvent Degreasing Operations)**

The Permittee has indicated that the Degreasing Operation is subject to the provisions of 326 IAC 8-3-2 and 326 IAC 8-3-5 for cold cleaner operations.

- (a) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:
  - (1) Equip the cleaner with a cover;
  - (2) Equip the cleaner with a facility for draining cleaned parts;

- (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
  - (5) Provide a permanent, conspicuous label summarizing the operation requirements; and
  - (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
- (b) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.

- (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (c) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.
- (d) Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaning Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

Pursuant to 326 IAC 8-3-8(d)(2), to document compliance with the above, the Permittee shall maintain the following records for each purchase of solvent. These records shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

- (1) The name and address of the solvent supplier.
- (2) The date of purchase.
- (3) The type of solvent.
- (4) The volume of each unit of solvent.
- (5) The total volume of the solvent.
- (6) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

### **Compliance Determination and Monitoring Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

(a) Particulate Control

- (1) In order to comply with Conditions D.1.1 and D.1.2, the baghouse dust collectors identified as BH1 and BH2 shall be in operation and control emissions from the Pangborn (No. 1) and Wheelabrator (No. 2) shot blast units at all times the shot blast units are in operation.
- (2) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (3) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

- (4) In order to comply with Conditions D.2.1 and D.2.2, the paint arrestor pads for particulate control, identified as PA1 and PA2, shall be in operation and control emissions from the two (2) paint booths (EU-02) at all times that the paint booths are in operation.

The operation of the particulate controls are necessary to ensure compliance with 326 IAC 6.5 emission limitations and to comply with emission limitations to render 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable to the source.

(b) Volatile Organic Compounds

Pursuant to 326 IAC 8-12-5, the paint booths (EU-02) and the outdoor spray operation (EU-03) shall determine compliance using the methods in 40 CFR 63.786, as incorporated by reference in 326 IAC 20-26, in lieu of 326 IAC 8-12-5.

The above compliance determination requirements are necessary to ensure compliance with 326 IAC 8-12 (Shipbuilding or Ship Repair Operations in Clark/Floyd/Lake/Porter Counties).

(c) Wind Velocity

In order to comply with Condition D.2.3(b), the Permittee shall determine the wind velocity and direction before the start of outdoor surface coating operations using spray application (EU-03).

- (a) If the Permittee determines that the wind velocity and/or direction could lead to overspray emissions that cross property boundaries, outdoor surface coating operations using spray application shall not commence until such time that favorable wind conditions prevail.
- (b) If, after commencing outdoor surface coating operations using spray application, changes in the wind velocity and/or direction occurs and will cause overspray to cross the property boundaries, all outdoor surface coating using spray application shall cease operation until such time that favorable wind conditions prevail.

This compliance determination requirement is necessary to minimize emissions from the outdoor coating operations to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Sources) 326 IAC 6-4 (Fugitive Dust Emissions), and 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations).

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

Control	Parameter	Frequency	Range	Excursions and Exceedances
Baghouse BH1 (controlling EU-01 shot blast unit No. 1)	Water Pressure Drop	Daily	1.0 to 7.0 inches	Response Step(s)
	Visible Emissions		Normal - Abnormal	
Baghouse BH2 (controlling EU-01 shot blast unit No. 2)	Visible Emissions	Daily	Normal - Abnormal	Response Step(s)
	Baghouse Inspections	Quarterly	Normal - Abnormal	Replace Defective Bag(s)
Paint Arrestor Pads PA1 and PA2 (controlling EU-02 spray booths)	Inspections	Daily	Normal - Abnormal	Response Step(s)
		Monthly		
	Observations	Weekly		

The above compliance monitoring requirements are necessary because the control devices must work properly in order to ensure compliance with 326 IAC 6.5 and to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable to the source. In addition, the above requirements shall satisfy 40 CFR 64 (CAM).

<b>Proposed Changes</b>
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The changes listed below have been made to Part 70 Operating Permit Renewal No. T019-18066-00006. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

**Changes Affecting Conditions Throughout the Permit**

- (a) *Multiple Conditions - Rule References*  
 On October 1, 2010, revisions to Title 326 of the Indiana Administrative Code (IAC) were published in the Indiana Register. Some of the revisions affect the IAC references included in the permit. The permit has been revised to reflect the revisions that were made to Title 326 of the IAC.
- (b) *Multiple Conditions - Mailing Address*  
 IDEM, OAQ has decided to remove all references to the source mailing address. IDEM,

OAQ will continue to maintain records of the mailing address.

- (c) *Multiple Conditions - Timeframe References*  
IDEM, OAQ has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore, all references to timelines have been revised to "no later than" or "not later than" except for the timelines in subparagraphs (b)(4) and (b)(5) of Section B - Emergency Provisions and Section B - Annual Fee Payment, in which the underlying rules state "within".
- (d) *Multiple Conditions - Responsible Official References*  
326 IAC 2-7 requires that "a responsible official" perform certain actions. 326 IAC 2-7-1(34) allows for multiple people to meet the definition of "responsible official." Therefore, IDEM, OAQ is revising all instances of "the responsible official" to read "a responsible official".
- (e) *Multiple Conditions - Certification Requirement References*  
IDEM, OAQ has decided to clarify what rule requirements a certification needs to meet.
- (f) *Multiple Conditions - Branch Name Updates*  
Several of IDEM's Branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to Permit Administration and Development Section and the Permits Branch have been changed to Permit Administration and Support Section. References to Asbestos Section, Compliance Data Section, Air Compliance Section, and Compliance Branch have been changed to Compliance and Enforcement Branch.
- (g) *Multiple Conditions - Typographical Errors, Language Clarification*  
Throughout the permit, typographical and grammatical errors have been corrected. Additionally, changes to language for clarification or to align with the current preferred permit language conventions have been made.
- (h) *Multiple Conditions - Alternative Operating Scenario No. 2*  
Previously, Jeffboat, LLC had an alternative operating scenario in its permit to handle coating of miscellaneous metal parts and products. IDEM, OAQ has determined that a change in the method of operation would have to be evaluated for permitting and will not allow for a blanket approval for miscellaneous metal coating. All references and applicable requirements fro Alternative Operating Scenario No. 2 have been removed from the permit.

#### **Changes Specific to Section A of the Permit**

- (a) To minimize future amendments to the issued Part 70 Permits, IDEM, OAQ decided to delete the name and/or title of the Responsible Official (RO) in Section A.1, General Information, of the permit. However, OAQ will still be evaluating if a change in RO meets the criteria specified in 326 IAC 2-7-1(34).
- (b) The general source phone number was updated in Section A.1.
- (c) Section A.1 of the permit has been revised to update the Source Status of the permit to reflect the current regulatory status.
- (d) The emission unit descriptions in Section A.2 of the permit have been revised for clarity and to include additional descriptive information as provided by the Permittee.
- (e) Section A.3 of the permit has been revised to include all insignificant activities located at the source.

Section A of the permit has been revised as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(145)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary ship building and repair facility.

Responsible Official: ~~\_\_\_\_\_~~ Vice President/General Manager  
Source Address: 1030 East Market Street, Jeffersonville, Indiana 47130  
Mailing Address: ~~\_\_\_\_\_~~ 1030 East Market Street, Jeffersonville, Indiana 47130  
General Source Phone Number: (812) 288-~~16400384~~  
SIC Code: 3731 for ~~Operating Scenario No. 1;~~  
3441 and 3449 for ~~Alternative Operating Scenario No. 2~~  
County Location: Clark  
Source Location Status: Nonattainment for PM2.5 and 8-hour ozone standard;  
Attainment for all other criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD, ~~Emission Offset Rules~~ and  
Nonattainment NSR;  
Major Source, Section 112 of the Clean Air Act  
Not in 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(154)]

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

- (a) **Indoor shot blasting operations, identified as EU-01, with a maximum capacity of 600 marine vessels per year, consisting of:**
- (1) **One (1) shot blast unit, known as Pangborn (No. 1), constructed in 1980, with a maximum airflow of 13,000 acfm, using steel shot, and exhausting to a baghouse dust collector identified as BH1.**
  - (2) **One (1) shot blast unit, known as Wheelabrator (No. 2), constructed in 1970, with a maximum airflow of 12,000 acfm, using steel shot, and exhausting to a baghouse dust collector identified as BH2.**
- ~~(a) Two (2) shot blast units, identified as EU-01, also known as Pangborn (No. 1) and Wheelabrator (No. 2), with a maximum capacity of 600 marine vessels per year. Emissions are controlled by baghouse dust collectors identified as BH1 and BH2. Unit No. 1 was constructed in 1980. Unit No. 2 was constructed in 1970.~~
- (b) Surface coating operations consisting of the following:
- (1) Two (2) spray booths, identified as EU-02, for the application of weld-through (shop) primer when performing shipbuilding, with a maximum capacity of 600 marine vessels per year, ~~with E emissions are~~ controlled by paint arrestor pads, identified as PA1 and PA2. Unit No. 1 was constructed in 1980. Unit No. 2 was constructed in 1970. Under ~~NESHAP 40 CFR 63, Subpart II~~, this is considered shipbuilding and repair.
  - (2) Outdoor spray operations, identified as EU-03, constructed in 1939, consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications, with a maximum capacity of 600 marine vessels per year. **A portion of the outdoor spray operations are conducted under cover that was installed in 2006.** Under ~~NESHAP 40 CFR 63, Subpart II~~, this is considered shipbuilding and repair.

~~These units have two different operating scenarios: Alternative Operating Scenario No. 1 consists of emission units EU-02 and EU-03 performing surface coating related to ship building and repair. Alternative Operating Scenario No. 2 consists of emission units EU-02 and EU-03 performing non-shipbuilding related metal coating.~~

- (c) ~~Outdoor w~~**Welding operations, identified as EU-04, occurring outside and under a structure, for the construction of marine vessels from sheet steel, constructed in 1939, with a maximum capacity of 600 marine vessels per year, and with constructed in 1939. Emissions are uncontrolled and exhausted to the atmosphere.**
- (d) ~~Outdoor f~~**Flame and plasma cutting operations, identified as EU-05, occurring outside and under a structure, for the construction of marine vessels from sheet steel, with flame cutting operations installed in 1939 and plasma cutting operations installed in 1990, with a maximum capacity of 600 marine vessels per year, and constructed in 1939. Emissions are uncontrolled and exhausted to the atmosphere.**
- (e) Four (4) abrasive outdoor blasting units for the outdoor maintenance and construction of marine vessels, identified as EU-06, constructed in 2002, with a maximum capacity of 2.0 tons of blast media per hour, and with. Emissions are controlled by a dust suppressant and exhausted to the atmosphere.

~~Note: Alternative Operating Scenario No. 2 would only be used when the shipbuilding business is slow. Alternative Operating Scenario No. 2 has never been used to date.~~

A.3 ~~Specifically Regulated~~ Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(145)]

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

- (a) **Paved and unpaved roads and parking lots with public access. [326 IAC 6-4] [326 IAC 6-5]**
- (b) **Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including the following:**
  - (1) **Two (2) natural gas fired water-dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]**
  - (2) **Two (2) natural gas fired pre-dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]**
  - (3) **Two (2) natural gas fired dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]**
  - (4) **Two (2) natural gas fired furnaces, with a maximum heat input capacity of 3.0 MMBtu/hr. [326 IAC 6.5-1]**
- (c) **A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. [326 IAC 8-4-6]**
- (d) **Machining where an aqueous cutting coolant continuously floods the machining interface.**

- (e) **Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.**
- (f) **Purging of gas lines and vessels that is related to 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.**
- (g) **Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]**

~~This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):~~

~~Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]~~

### **Changes Specific to Sections B and C of the Permit**

IDEM, OAQ has made changes to some of the standard language in the B and C conditions of the permit to help clarify the intent of these conditions. The following is a summary of the revisions that have been made to the B and C Sections of the permit:

- (a) *Section B - Enforceability*  
The appropriate Indiana Code reference has been added to the rule citations.
- (b) *Section B - Duty to Provide Information*  
IDEM, OAQ has revised Section B - Duty to Provide Information by removing the statement that the submittal by the Permittee requires the certification by the "responsible official".
- (c) *Section B - Certification*  
IDEM, OAQ has decided to clarify Section B - Certification to be consistent with the rule and to clarify that Section B - Certification only states what a certification must be.
- (d) *Section B - Annual Compliance Certification*  
The submittal deadline for the annual compliance certification has been changed to April 15 of each year to be consistent with the submittal requirement for other sources in Clark County.
- (e) *Section B - Preventive Maintenance Plan*  
IDEM, OAQ has added a new paragraph to handle a future situation where the Permittee adds units that need preventive maintenance plans developed. IDEM, OAQ has also decided to clarify other aspects of Section B - Preventive Maintenance Plan.
- (f) *Section B - Emergency Provisions*  
IDEM, OAQ is revising Section B - Emergency Provisions to delete paragraph (h). 326 IAC 2-7-5(3)(C)(ii) allows that deviations reported under an independent requirement do not have to be included in the Quarterly Deviation and Compliance Monitoring Report. IDEM, OAQ has also added the Southeastern Regional Office to Section B - Emergency Provisions.
- (g) *Section B - Deviation from Permit Requirements and Section C - General Reporting Requirements*  
IDEM, OAQ has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, Section B - Deviation from Permit Requirements and Conditions has been removed and the requirements of that condition have been added to

Section C - General Reporting Requirements. Paragraph (d) of Section C - General Reporting Requirements has been removed because IDEM, OAQ already states the timeline and certification needs of each report in the condition requiring the report.

- (h) *Section B - Permit Renewal*  
IDEM, OAQ has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information. Therefore, Section B - Permit Renewal has been revised.
- (i) *Section B - Permit Revision Under Economic Incentives and Other Programs*  
IDEM, OAQ has decided to state that no notice is required for approved changes in Section B - Permit Revision Under Economic Incentives and Other Programs.
- (j) *Section B - Source Modification Requirement*  
IDEM, OAQ has decided to reference 326 IAC 2 in Section B - Source Modification Requirement rather than the specific construction rule.
- (k) *Section C - Opacity*  
IDEM, OAQ has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.
- (l) *Section C - Incineration*  
IDEM, OAQ has revised Section C - Incineration to more closely reflect the two underlying rules.
- (m) *Section C - Fugitive Dust Emissions [326 IAC 6-4] and Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]*  
Statements indicating the portions of 326 IAC 6-4 and 326 IAC 6-5 that are not federally enforceable have been included in the respective conditions.
- (n) *Section C - Asbestos Abatement Projects*  
IDEM, OAQ has revised paragraph (g) of Section C - Asbestos Abatement Projects to match the rule language in 326 IAC 14-10-1(a).
- (o) *Section C - Performance Testing*  
IDEM, OAQ has removed the first paragraph of Section C - Performance Testing due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.
- (p) *Section C - Compliance Monitoring*  
IDEM, OAQ has revised Section C - Compliance Monitoring. The reference to recordkeeping has been removed due to the fact that other conditions already address recordkeeping. The voice of the condition has been changed to clearly indicate that it is the Permittee that must follow the requirements of the condition.
- (q) *Section C - Monitoring Methods*  
IDEM, OAQ has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.
- (r) *Section C - Instrument Specifications*  
A condition was added to include instrument specification requirements.
- (s) *Section C - Emergency Reduction Plans*  
An ERP can be updated without a permit change, so the wording of this condition has been revised to indicate that the Permittee shall maintain the most recently submitted ERP.

- (t) *Section C - Response to Excursions or Exceedances*  
IDEM, OAQ has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit. Additionally, IDEM, OAQ has decided to indicate that a reasonable response step(s) shall be taken for compliance monitoring parameters outside of the range instead of reasonable response steps. It will be up to the Permittee to determine the number of reasonable response steps required to bring a control device parameter back into the normal range.
- (u) *Section C - Actions Related to Noncompliance Demonstrated by a Stack Test*  
IDEM, OAQ has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was revised from "the receipt of the test results" to "the date of the test". There was confusion if the "receipt" was by IDEM, the Permittee or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.
- (v) *Section C - Emission Statement*  
IDEM, OAQ decided to remove paragraph (b) of Section C - Emission Statement since it was duplicative of the requirement in Section C - General Reporting Requirements. Additionally, the emission statement submittal frequency has been changed from annually to once every three (3) years based on the applicability and compliance schedule of 326 IAC 2-6.
- (w) *Section C - General Record Keeping Requirements*  
The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph.
- (x) *Section C - Compliance with 40 CFR 82 and 326 IAC 22-1*  
IDEM, OAQ has decided to simplify the referencing in Section C - Compliance with 40 CFR 82 and 326 IAC 22-1.

### **Changes to the D Sections of the Permit**

IDEM, OAQ has made changes to some of the standard language in conditions in the D Sections of the permit to help clarify the intent of these conditions. The following is a summary of the revisions that have been made to the D Sections of the permit:

- (a) For clarity, IDEM, OAQ has changed references to the general conditions such as "in accordance with Section B", "in accordance with Section C", or other similar language to "Section C...contains the Permittee's obligation with regard to the records required by this condition.
- (b) The word "status" has been added to the Record Keeping Requirements and Reporting Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.
- (c) IDEM, OAQ has decided that the language for bag failure in multi-compartment baghouses is more appropriately placed in the Compliance Monitoring Requirements portion of the D sections rather than the Compliance Determination Requirements portion because a bag failure in a multi-compartment baghouse does not necessarily indicate that the control device is unable to operate and control emissions. If a failure occurs in a multi-compartment baghouse, a response step(s) should be taken. Additionally, the language for single compartment baghouse failure is more appropriately placed in the Compliance Determination portion of the D sections rather than the Compliance Monitoring portion of the D sections because failure of a single compartment baghouse that is needed to meet an emission limit is indicative of a deviation from the permit.
- (d) IDEM, OAQ has decided to indicate that a reasonable response step(s) shall be taken for compliance monitoring parameters outside of the range instead of reasonable response steps. It will be up to the Permittee to determine the number of reasonable response steps required to bring control device parameter back into the normal range.

#### **Changes Specific to Section D.1 of the Permit**

- (a) The emission unit descriptions were revised for clarification.
- (b) PSD and Nonattainment NSR minor limits were included in the permit for the shot blast units (EU-01) in order to appropriately limit emissions from the source to less than the PSD and Nonattainment NSR major source thresholds for PM, PM10, and PM2.5. These are Title I changes to the permit. Additionally, corresponding Compliance Determination, Compliance Monitoring, and Record Keeping requirements have been added to Section D.1.

#### **Changes Specific to Section D.2 of the Permit**

- (a) The emission unit descriptions were revised for clarification.
- (b) PSD and Nonattainment NSR minor limits were included in the permit for the indoor spray booths (EU-02) in order to appropriately limit emissions from the source to less than the PSD and Nonattainment NSR major source thresholds for PM, PM10, and PM2.5. These are Title I changes to the permit. Additionally, corresponding Compliance Determination, Compliance Monitoring, and Record Keeping requirements have been added to Section D.2
- (c) Work practice standards for the outdoor coating operations (EU-03) have been included for complying with 326 IAC 6-3 and 326 IAC 6-5.
- (d) Permit conditions that include the requirements of 326 IAC 8-12 have been rearranged for clarity and to better reflect the rule language.
- (e) The requirements of 40 CFR 63, Subpart II have been moved to Section E.1 of the permit. The entire rule is included as Attachment B to the permit.

### New D Sections

- (a) Section D.3 was added to the permit to incorporate requirements for the welding operations, flame and plasma cutting operations, and outdoor abrasive blasting operations. These operations have been determined to be sources of fugitive emissions. In the last Part 70 Operating Permit Renewal, these units were not included in the permit because no applicable requirements were identified. No changes to these operations have occurred; however, it has been determined that 326 IAC 6-3 and 326 IAC 6-5 are applicable. The appropriate limitations, work practice standards, and record keeping requirements have been included.
- (b) Section D.4 was added to the permit to incorporate requirements for small natural gas combustion sources. No changes to these operations have occurred; however, it has been determined that 326 IAC 6.5 is applicable. The 326 IAC 6.5 emission limitation has been included in the permit.
- (c) Section D.5 of the permit was added to incorporate requirements for a gasoline dispensing operation. No changes to this operation has occurred; however, it has been determined that 326 IAC 8-4-6 is applicable. The requirements of 326 IAC 8-4-6 have been included in the permit.
- (d) Section D.6 of the permit was added to incorporate the requirements for degreasing operations. No changes to this operation has occurred; however, it has been determined that 326 IAC 8-3-2, 326 IAC 8-3-5, and 326 IAC 8-3-8 are applicable. The requirements of these rules have been included in the permit.

The permit has been revised as follows:

#### SECTION D.1

#### FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(145)]:

- (a) **Indoor shot blasting operations, identified as EU-01, with a maximum capacity of 600 marine vessels per year, consisting of:**
  - (1) **One (1) shot blast unit, known as Pangborn (No. 1), constructed in 1980, with a maximum airflow of 13,000 acfm, using steel shot, and exhausting to a baghouse dust collector identified as BH1.**
  - (2) **One (1) shot blast unit, known as Wheelabrator (No. 2), constructed in 1970, with a maximum airflow of 12,000 acfm, using steel shot, and exhausting to a baghouse dust collector identified as BH2.**
- ~~(a) Two (2) shot blast units, identified as EU-01, also known as Pangborn (No. 1) and Wheelabrator (No. 2), with a maximum capacity of 600 marine vessels per year. Emissions are controlled by baghouse dust collectors identified as BH1 and BH2. Unit No. 1 was constructed in 1980. Unit No. 2 was constructed in 1970.~~

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a), (~~formerly 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations)) and T019-6874-00006, issued July 13, 1999,~~ particulate matter (PM) emissions from the **Pangborn (No. 1) and Wheelabrator (No. 2)** shot blast units (~~identified as EU-01~~), shall be limited to 0.03 grain per dry standard cubic foot of exhaust air **each**.

D.1.2 PSD and Nonattainment NSR Minor Limits [326 IAC 2-2] [326 IAC 2-1.1-5]

In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the Permittee shall comply with the following emission limitations:

PM, PM10, and PM2.5 emissions from the indoor blasting operations (EU-01) shall be less than the values in the following table:

Emission Unit	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
EU-01: Pangborn (No. 1)	9.06	9.06	9.06
EU-01: Wheelabrator (No. 2)	9.06	9.06	9.06

Compliance with the above limits, combined with the limits in Condition D.2.2 and the potential to emit PM, PM10, and PM2.5 from other units at this source, shall limit the potential to emit of PM and PM10 from the entire source to less than two hundred and fifty (250) tons per twelve (12) consecutive month period each and shall limit the potential to emit PM2.5 from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period and render the requirements of PSD (326 IAC 2-2) and Nonattainment NSR (326 IAC 2-1.1-5) not applicable to the source.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these units and any control devices. Section B – Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.24 Particulate Control

- (a) Pursuant to ~~T019-6874-00006, issued July 13, 1999,~~ and in order to **ensure compliance** with Conditions D.1.1 and D.1.2, the baghouse dust collectors identified as BH1 and BH2 shall be in operation and control emissions from the **Pangborn (No. 1) and Wheelabrator (No. 2)** shot blast units at all times the shot blast units are in operation.
- (b) ~~In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~
- (b) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

#### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

##### D.1.5 Visible Emissions Notations [40 CFR 64]

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- (a) Daily visible emission notations of the exhaust from baghouses BH1 and BH2, controlling emissions from the Pangborn (No. 1) and Wheelabrator (No. 2) shot blast units shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response step(s). Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response step(s) required by this condition. Failure to take a response step(s) shall be considered a deviation from this permit.

##### D.1.6 Parametric Monitoring [40 CFR 64]

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The Permittee shall record the pressure drop across the baghouse BH1 used in conjunction with the Pangborn (No. 1) shot blast unit at least once per day when the Pangborn (No. 1) shot blast unit is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 7.0 inches of water or a range established during the latest stack test, the Permittee shall take a reasonable response step(s). Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response step(s) required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take a response step(s) shall be considered a deviation from this permit.

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

#### **D.1.7 Baghouse Inspections**

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**An inspection shall be performed each calendar quarter of all bags controlling the Wheelabrator (No. 2) shot blast unit. All defective bags shall be replaced.**

#### **D.1.8 Broken or Failed Bag Detection - Multi-Compartment Baghouse [40 CFR 64]**

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**In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

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

##### **D.1.9 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain daily records of the visible emission notations of the exhaust from baghouses BH1 and BH2. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (e.g. the process did not operate that day).**
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain daily records of the pressure drop across the baghouses, BH1 and BH2, controlling emissions from Pangborn (No. 1) and Wheelabrator (No. 2) shot blast units. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).**
- (c) To document the compliance status with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7.**
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.**

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(145)]:

(bd) Surface coating operations consisting of the following:

- (1) Two (2) spray booths, identified as EU-02, for the application of weld-through (shop) primer when performing shipbuilding, with a maximum capacity of 600 marine vessels per year, ~~with E emissions are~~ controlled by paint arrestor pads, identified as PA1 and PA2. Unit No. 1 was constructed in 1980. Unit No. 2 was constructed in 1970. Under ~~NESHAP 40 CFR 63, Subpart II~~, this is considered shipbuilding and repair.
- (2) Outdoor spray operations, identified as EU-03, constructed in 1939, consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications, with a maximum capacity of 600 marine vessels per year. **A portion of the outdoor spray operations are conducted under cover that was installed in 2006.** Under ~~NESHAP 40 CFR 63, Subpart II~~, this is considered shipbuilding and repair.

~~These units have two different operating scenarios: Alternative Operating Scenario No. 1 consists of emission units EU-02 and EU-03 performing surface coating related to ship building and repair. Alternative Operating Scenario No. 2 consists of emission units EU-02 and EU-03 performing non-shipbuilding related metal coating.~~

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

**D.2.1 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]**

Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the spray booths (EU-02) shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

**D.2.2 PSD and Nonattainment NSR Minor Limits [326 IAC 2-2] [326 IAC 2-1.1-5]**

In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the Permittee shall comply with the following emission limitations:

Emission Unit	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
EU-02: Spray Booth No. 1	2.28	2.28	2.28
EU-02: Spray Booth No. 2	2.28	2.28	2.28

Compliance with the above limits, combined with the limits in Condition D.1.2 and the potential to emit from other units at this source, shall limit the potential to emit of PM and PM10 from the entire source to less than two hundred fifty (250) tons per twelve (12) consecutive month period each and the potential to emit of PM 2.5 from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period and render the requirements of PSD (326 IAC 2-2) and Nonattainment NSR (326 IAC 2-1.1-5) not applicable to the source.

**D.2.3 Particulate [326 IAC 6-3] [326 IAC 6-5]**

Pursuant to 326 IAC 6-3-2(d) (Particulate Matter Emission Limitations for Manufacturing Processes), particulate from the outside spray operations (EU-03) shall be controlled by the following work practice standards:

- (a) **Surface coating operations shall be conducted in such a manner that all particulate matter (drift or over spray) remains on the source's property.**
- (b) **Surface coating with spray application shall be limited to times when the wind velocity and direction does not cause overspray to cross the property line.**
- (c) **Surface coating with spray application shall be conducted with the use of containment methods such as curtains or shrouds where practical and possible.**
- (d) **Surface coating of flat horizontal surfaces of vessels shall be accomplished by rolling or brushing when practical.**

**Compliance with the above work practice standards shall also satisfy compliance with 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations).**

D.2.44 Volatile Organic Compounds (VOC) [326 IAC 8-12-4]

~~(a) Pursuant to 326 IAC 8-12-4(a) (Shipbuilding or ship repair operations in Clark, Floyd, Lake, or Porter counties), VOC emissions from the No. 1 and No. 2 spray booths (EU-02) and the outdoor surface coating operations (EU-02 and EU-03) under alternate operating scenario No. 4 shall be limited throughout the year as follows:~~

- ~~(1a) During application of specialty coatings, VOC emissions shall be limited throughout the year. Provisions applicable to specialty coatings are as follows:~~
  - ~~(A1) Special marking coatings shall not exceed a VOC content of four and eight-hundredths (4.08) pounds per gallon.~~
  - ~~(B2) Heat resistant and high-gloss coatings shall not exceed a VOC content of three and fifty-hundredths (3.50) pounds per gallon.~~
  - ~~(C3) High-temperature coatings shall not exceed a VOC content of four and seventeen-hundredths (4.17) pounds per gallon.~~
  - ~~(D4) Any other specialty coating shall not exceed a VOC content of two and eighty-three hundredths (2.83) pounds per gallon.~~
- ~~(2b) During application of any general use coating, VOC emissions shall be limited as follows:~~
  - ~~(A1) The VOC content of any general use coating shall not exceed two and eighty-three hundredths (2.83) pounds per gallon, as applied.~~
  - ~~(B2) From May 1 through September 30, no thinner shall be added to any general use coating.~~
- (c) During application of any weld-through (shop) preconstruction primer, VOC emissions shall be limited throughout the year as follows:**
  - (1) Waterbased weld-through (shop) preconstruction primer shall be used.**
  - (2) The VOC content of weld-through (shop) preconstruction primer, as applied, shall not exceed zero (0).**
  - (3) No VOC containing cleaning material shall be used in the primer application facility.**

- (4) No VOC containing thinner shall be added to the weld-through (shop) pre-construction primer.**
- (d) If the Permittee determines that a waterbased weld-through (shop) preconstruction primer can no longer be used due to an operational, performance, or availability constraint associated with the waterbased weld-through (shop) preconstruction primer, the Permittee shall do the following:**

  - (1) Notify the department within seven (7) days of discontinuing use of the waterbased weld-through (shop) preconstruction primer.**
  - (2) Submit to the department for approval a plan for an alternative control within sixty (60) days of discontinuance. The alternative control shall consist of one (1) of the following:**

    - (A) A waterbased weld-through (shop) preconstruction primer.**
    - (B) A control system with a minimum overall VOC emissions reduction efficiency of ninety-five percent (95%) that is subject to each of the following requirements:**

      - (i) The operation, maintenance, and testing requirements of 326 IAC 8-7-9.**
      - (ii) The monitoring, record keeping, and reporting requirements of 326 IAC 8-7-10.**
  - (3) Install the alternative control within nine (9) months of approval by the department of the plan required in D.2.5(d)(2).**
- (e) During the time between the date when the Permittee discontinues the use of the waterbased preconstruction primer and the date when the alternative control is installed, the weld-through (shop) preconstruction primer used by the Permittee shall not exceed a VOC content of five and sixty-five hundredths (5.65) pounds per gallon or the VOC content for weld-through (shop) preconstruction primer prescribed by the U.S. EPA in 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating), whichever is lower.**
- ~~(b) The Permittee shall comply with the following work practice standards:~~

  - ~~(1) Cleaning accessories, such as, but not limited to, paper, cloth, and rags that have been used for cleaning surfaces and equipment and that contain cleaning materials shall be stored in normally closed gasket sealed containers.~~
  - ~~(2) VOC-containing solvents and coatings shall be stored in normally closed sealed containers prior to use. Spent VOC-containing solvents and coatings shall be stored in normally closed gasket sealed containers.~~
  - ~~(3) Cleaning materials for cleaning spray equipment, including paint lines, shall not be used unless the equipment for collecting the cleaning materials and minimizing its evaporation to the atmosphere is used.~~
  - ~~(4) All handling and transfer of VOC-containing materials to and from containers, tanks, vats, drums, and piping systems shall be conducted in a manner that minimizes drips and spills, and any drips and spills shall be cleaned up promptly.~~

- ~~(5) All containers, tanks, vats, drums, and piping systems shall be free of cracks, holes and other defects and must be closed unless materials are being added to or removed from them.~~

**D.2.25 Volatile Organic Compounds (VOC) Work Practice Standards [326 IAC 8-12-4]**

**Pursuant to 326 IAC 8-12-4(b), the Permittee shall comply with the following work practice standards:**

- (a) Cleaning accessories, such as, but not limited to, paper, cloth, and rags that have been used for cleaning surfaces and equipment and that contain cleaning materials shall be stored in normally closed gasket sealed containers.**
- (b) VOC-containing solvents and coatings shall be stored in normally closed sealed containers prior to use. Spent VOC-containing solvents and coatings shall be stored in normally closed gasket sealed containers.**
- (c) Cleaning materials for cleaning spray equipment, including paint lines, shall not be used unless the equipment for collecting the cleaning materials and minimizing its evaporation to the atmosphere is used.**
- (d) All handling and transfer of VOC-containing materials to and from containers, tanks, vats, drums, and piping systems shall be conducted in a manner that minimizes drips and spills, and any drips and spills shall be cleaned up promptly.**
- (e) All containers, tanks, vats, drums, and piping systems shall be free of cracks, holes and other defects and must be closed unless materials are being added to or removed from them.**

~~(a) Pursuant to 326 IAC 8-12-4 (Shipbuilding or ship repair operations in Clark, Floyd, Lake, or Porter counties), VOC emissions from the surface coating operations (EU-02) and (EU-03) during application of any weld-through (shop) preconstruction primer under alternate operating scenario 1 shall be limited as follows:~~

~~(1) During application of any weld-through (shop) preconstruction primer, VOC emissions shall be limited throughout the year as follows:~~

~~(A) Waterbased weld-through (shop) preconstruction primer shall be used.~~

~~(B) The VOC content of weld-through (shop) preconstruction primer, as applied, shall not exceed zero (0).~~

~~(C) No VOC containing cleaning material shall be used in the primer application facility.~~

~~(D) No VOC containing thinner shall be added to the weld-through (shop) preconstruction primer.~~

~~(2) If the Permittee determines that a waterbased weld-through (shop) preconstruction primer can no longer be used due to an operational, performance, or availability constraint associated with the waterbased weld-through (shop) preconstruction primer, the source shall do the following:~~

~~(A) Notify the department within seven (7) days of discontinuing use of the waterbased weld-through (shop) preconstruction primer.~~

~~(B) Submit to the department for approval a plan for an alternative control~~

~~within sixty (60) days of discontinuance. The alternative control shall consist of one (1) of the following:~~

- ~~(i) A waterbased weld-through (shop) preconstruction primer.~~
- ~~(ii) A control system with a minimum overall VOC emissions reduction efficiency of ninety-five percent (95%) that is subject to each of the following requirements:
  - ~~(AA) The operation, maintenance, and testing requirements of 326 IAC 8-7-9.~~
  - ~~(BB) The monitoring, record keeping, and reporting requirements of 326 IAC 8-7-10.~~~~

~~(C) Install the alternative control within nine (9) months of approval by the department of the plan required in clause 326 IAC 8-12-4 (a)(2)(b).~~

- ~~(3) During the time between the date when the Permittee discontinues the use of the water-based preconstruction primer and the date when the alternative control is installed, the weld-through (shop) preconstruction primer used by the Permittee shall not exceed a VOC content of five and sixty-five hundredths (5.65) pounds per gallon, the VOC content for weld-through (shop) preconstruction primer prescribed by the U.S. EPA in 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating).~~

#### D.2.63 Training Requirements [326 IAC 8-12-4]

~~(a) Pursuant to 326 IAC 8-12-4(c), spray booths EU-02 and the outdoor spray operation (EU-3) under alternate operating scenario 1 the Permittee shall comply with the following training requirements:~~

- ~~(1a)~~ The training program may include training provided by the manufacturer or supplier of coatings, cleaning materials, or the application equipment thereof, and shall include written procedures, hands-on demonstration, as appropriate, and certification by the trainer of the trainee's ability to perform the task, on the following activities:
  - ~~(A1)~~ Identification of appropriate coatings or cleaning materials.
  - ~~(B2)~~ Preparation of coatings or cleaning materials according to coating or cleaning material manufacturer, distributor, or owner or operator's recommendations.
  - ~~(C3)~~ Application of coatings or cleaning materials, or organic solvents using techniques that minimize their usage.
  - ~~(D4)~~ Procedures to clean spray guns to minimize evaporation of organic solvents to the atmosphere.
  - ~~(E5)~~ Work practice standards established in 326 IAC 8-12-4(b).
  - ~~(F6)~~ **Procedures to gather, record, monitor, and report data in accordance with 40 CFR 63.787 and 40 CFR 63.788.**
- ~~(2b)~~ The Permittee shall provide annual refresher training **prior to May 1** to any worker performing one (1) or more of the activities listed in 326 IAC 8-12-4~~(5)(b)(c)~~(3). Such training shall be appropriate to the job responsibilities of the worker.

- (3c) Any worker may perform one (1) or more activities listed in 326 IAC 8-12-4(5)(b)(c)(3), for not more than one hundred eighty (180) days, notwithstanding the requirement of 326 IAC 8-12-4(5)(b)(c)(2), provided:
- (A1) such untrained worker works under the supervision of a worker who meets the training requirements of 326 IAC 8-12-4(5)(b)(c)(2); and
  - (B2) the Permittee keeps records of:
    - (iA) The date the worker was assigned to the activity;
    - (iiB) The date training was completed; and
    - (iiiC) The name of the worker providing the supervision.

~~D.2.4 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]~~

~~(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) and when operating under alternative operating scenario No. 2, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of the following limits from the surface coating operations:~~

- ~~(1) Four and three-tenths (4.3) pounds for clear coats;~~
  - ~~(2) Three and five-tenths (3.5) pounds for air dried or forced warm air dried coatings;~~
  - ~~(3) Three and five-tenths (3.5) pounds for extreme performance coatings; and~~
  - ~~(4) Three (3.0) pounds for all other coatings~~
- ~~per gallon of coating excluding water, as delivered to the applicator.~~

~~(b) Pursuant to 326 IAC 8-2-9(f), solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete, and the waste solvent shall be disposed of in a manner that minimizes evaporation.~~

~~D.2.5 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]~~

~~Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the paint booths (EU-02) and outdoor spray operation (EU-03) under alternate operating scenario 2 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation~~

~~D.2.6 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]~~

~~Pursuant to 326 IAC 6.5-1-2(a) (formerly 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the spray booth (EU-02) shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.~~

~~D.2.7 Preventive Maintenance Plan [326 IAC 2-7-5(123)]~~

~~A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for the spray booths (EU-02) these units and their any control devices. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the plan required by this condition.~~

## Compliance Determination Requirements

### D.2.8 Volatile Organic Compounds (VOC) [326 IAC 8-12-5]

Pursuant to 326 IAC 8-12-5, the paint booths (EU-02) and the outdoor spray operation (EU-03) ~~under alternate operating scenario 1~~ shall determine compliance using the methods in 40 CFR 63.786, as incorporated by reference in 326 IAC 20-26, in lieu of 326 IAC 8-12-5.

### ~~D.2.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]~~

~~Compliance with the VOC content contained in Condition D.2.4 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.2.109~~ Particulate Control

~~(a) Pursuant to T019-6874-00006, issued July 13, 1999, and in order to ensure compliance with Conditions D.2.61 and D.2.2, the paint arrestor pads for PM particulate control, identified as PA1 and PA2, shall be in operation and control emissions from the two (2) paint booths (EU-02) at all times that the paint booths are in operation.~~

~~(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

### D.2.10 Wind Velocity

**In order to comply with Condition D.2.3(b), the Permittee shall determine the wind velocity and direction before the start of outdoor surface coating operations using spray application (EU-03).**

- (a) If the Permittee determines that the wind velocity and/or direction could lead to overspray emissions that cross property boundaries, outdoor surface coating operations using spray application shall not commence until such time that favorable wind conditions prevail.**
- (b) If, after commencing outdoor surface coating operations using spray application, changes in the wind velocity and/or direction occurs and will cause overspray to cross the property boundaries, all outdoor surface coating using spray application shall cease operation until such time that favorable wind conditions prevail.**

## Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)] [40 CFR Part 64]

### D.2.11 Monitoring [40 CFR 64]

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- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the paint arrestor pads for the paint booths (EU-02). To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stack(s) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take a reasonable response step(s). ~~in accordance with Section C - Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the response step(s) required by this condition.** Failure to take a response step(s) ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response step(s). ~~in accordance with Section C - Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the response step(s) required by this condition.** Failure to take a response step(s) ~~in accordance with Section C - Response to Excursions or Exceedances,~~ shall be considered a deviation from this permit.

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

### D.2.12 Record Keeping and Reporting Requirements for VOC (326 IAC 8-12-7)

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- (a) Pursuant to 326 IAC 8-12-7, sources subject to 326 IAC 8-12 and 326 IAC 20-26 shall comply with the record keeping and reporting requirements of 40 CFR 63.786, as incorporated by reference in 326 IAC 20-26, in lieu of 326 IAC 8-12-7. ~~when operating under alternate operating scenario 1.~~
- (b) ~~To document compliance with Condition D.2.3 when operating under alternate operating scenario 2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content usages limit established in Condition D.2.4.~~
- (1) ~~The VOC content of each coating material and solvent used less water.~~
- (2) ~~The amount of coating material and solvent used on monthly basis.~~
- (A) ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
- (B) ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
- (C) ~~The monthly cleanup solvent usage; and~~
- (D) ~~The total VOC usage for each month.~~
- (b) **To document the compliance status with Conditions D.2.3(b) and D.2.10, the Permittee shall maintain a log of wind velocity and wind direction readings.**
- (c) To document **the compliance status** with Condition D.2.11, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections. The

Permittee shall include in its daily record when an observation is not taken and the reason for the lack of observation, (**e.g.i.e.** the process did not operate that day).

- ~~(d) The Permittee shall maintain records of all dates and times when the facility is engaged in shipbuilding operations.~~
- ~~(de) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligation with regard to the records required by this condition.~~

#### **D.2.13 Record Keeping Requirements - Fugitive Control Measures [326 IAC 6-5]**

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Pursuant to 326 IAC 6-5-5(b), records shall be kept and maintained which document all control measures and activities to be implemented in accordance with Condition D.2.3. Said records shall be available upon the request of the commissioner, and shall be retained for three (3) years.

#### **National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-6.1-5]**

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##### ~~D.2.13 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]~~

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- ~~(a) Pursuant to 40 CFR 63.780, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, for the ship building and ship repair surface coating activities as specified in Table 1 of 40 CFR Part 63, Subpart II in accordance with the schedule in 40 CFR Part 63, Subpart II.~~
- ~~(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:~~

~~Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204~~

##### ~~D.2.14 National Emissions Standards for Hazardous Air Pollutants for Ship Building and Repair Surface Coating Requirements: [40 CFR Part 63, II] [326 IAC 20-26]~~

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~~Pursuant to 40 CFR Part 63, Subpart II, the Permittee shall comply with the provisions of the National Emission Standards for Shipbuilding and Ship Repair (Surface Coating), which are incorporated by reference as 326 IAC 20-26 for the ship building and ship repair surface coating activities as specified as follows:~~

#### **Subpart II – National Emission Standards for Shipbuilding and Ship Repair (Surface Coating)**

*Note: The requirements of 40 CFR 63, Subpart II have been removed from Section D.2 of the permit and are now included in Section E.1. For brevity, the rule language is not being shown in this technical support document.*

##### ~~D.2.15 One Time Deadlines Relating to NESHAP Subpart II: Ship Building and Repair Surface Coating~~

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~~Pursuant to 40 CFR 63.5800, the Permittee was required to demonstrate compliance with the standards in 40 CFR 63, Subpart II by December 15, 1997.~~

##### ~~D.2.16 General Provisions Relating to National Emissions Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]~~

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- ~~(a) Pursuant to 40 CFR 63.3901, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, for the two (2) spray booths identified as EV-02 and the one (1) outdoor spray~~

~~\_\_\_\_\_ operation identified as EV-03 as specified in Table 2 of 40 CFR Part 63, Subpart M MMMM  
\_\_\_\_\_ in accordance with the schedule in 40 CFR 63, Subpart M MMMM.~~

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

~~Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204~~

~~and~~

~~United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590~~

~~D.2.17 National Emissions Standards for Hazardous Air Pollutants for the Surface Coating of  
Miscellaneous Metal Parts and Products Requirements: [40 CFR Part 63, M MMMM]~~

~~Pursuant to 40 CFR Part 63, Subpart M MMMM, the Permittee shall comply with the provisions of  
the NESHAP for surface coating of Miscellaneous Metal Parts and Products for the two (2) spray  
booths identified as EV-02 and the one (1) outdoor spray operation identified as EV-03 specified  
as follows:~~

~~**Subpart M MMMM—National Emission Standards for Hazardous Air Pollutants for Surface Coating of  
Miscellaneous Metal Parts and Products**~~

~~*Note: The requirements of 40 CFR 63, Subpart M MMMM have been removed from Section D.2 of the  
permit as they are not applicable to this source. For brevity, the rule language is not being shown in this  
technical support document.*~~

~~D.2.18 One Time Deadlines Relating to NESHAP Subpart M MMMM: Surface Coating of Miscellaneous  
Metal Parts and Products~~

~~Pursuant to 40 CFR 63.3883, the Permittee shall demonstrate compliance with the standards in  
40 CFR 63, Subpart M MMMM by January 2, 2007. Pursuant to 40 CFR 63.3910, no other  
notifications are required after the initial notification.~~

**SECTION D.3 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(145)]:**

- (c) Welding operations, identified as EU-04, occurring outside and under a structure, for the construction of marine vessels from sheet steel, constructed in 1939, with a maximum capacity of 600 marine vessels per year, and with emissions uncontrolled and exhausted to the atmosphere.**
- (d) Flame and plasma cutting operations, identified as EU-05, occurring outside and under a structure, for the construction of marine vessels from sheet steel, with flame cutting operations installed in 1939 and plasma cutting operations installed in 1990, with a maximum capacity of 600 marine vessels per year and, with emissions uncontrolled and exhausted to the atmosphere.**
- (e) Four (4) abrasive outdoor blasting units for the outdoor maintenance and construction of marine vessels, identified as EU-06, constructed in 2002, with a maximum capacity of 2.0 tons of blast media per hour, and with emissions controlled by a dust suppressant and**

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(145)]:

exhausted to the atmosphere.

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

Pursuant to 326 IAC 6-3-2 (Particulate Emissions for Manufacturing Processes), the allowable particulate emission rate from the welding operations (EU-04), the flame and plasma cutting operations (EU-05), and the outdoor abrasive blasting units (EU-06) shall each not exceed 32.78 pounds per hour when operating at a maximum process weight rate of 22.26 tons per hour.

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

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

$$E = 4.10 P^{0.67}$$

Where            E = rate of emission in pounds per hour; and  
                      P = process weight rate in tons per hour

#### D.3.2 Fugitive Particulate Matter [326 IAC 6-5]

Pursuant to 326 IAC 6-5, the Permittee shall employ the following measures to control fugitive particulate matter emissions from the welding operations (EU-04), the flame and plasma cutting operations (EU-05), and the outdoor abrasive blasting operations (EU-06):

(a)     **Welding Operations (EU-04):**

- (1)     Welding operations shall be conducted in such a manner that all particulate matter remains on the source's property.
- (2)     Welding operations shall be conducted with the use of containment methods such as curtains or shrouds where practical and possible.
- (3)     The surfaces to be welded shall be kept clean of oils and grease.
- (4)     Welding shall be conducted using the lowest recommended current and voltage that will provide quality welds.
- (5)     Cleanup from welding operations shall be performed through wet cleaning methods or vacuums equipped with appropriate filters.
- (6)     Welders shall be trained on operating techniques and procedures to reduce welding fumes and fugitive emissions.

(b)     **Flame and Plasma Cutting Operations (EU-05):**

- (1) Cutting operations shall be conducted in such a manner that all particulate matter remains on the source's property.
  - (2) Cutting operations shall be conducted with the use of containment methods such as curtains or shrouds where practical and possible.
  - (3) The surfaces to be cut shall be kept clean of oils and grease.
  - (4) Cutting shall be conducted using lower recommended cutting speeds to minimize emissions.
  - (5) Cleanup from cutting operations shall be performed through wet cleaning methods or vacuums equipped with appropriate filters.
  - (6) Cutting operators shall be trained on operating techniques and procedures to reduce fugitive emissions from cutting operations.
- (c) Outdoor Abrasive Blasting Operations (EU-06):
- (1) Outdoor abrasive blasting operations shall be conducted in such a manner that all particulate matter remains on the source's property.
  - (2) Outdoor abrasive blasting operations shall be conducted with the use of containment methods such as curtains or shrouds where practical and possible.
  - (3) The use of a dust suppressant additive or water injection shall be employed whenever the outdoor abrasive blasting units are in operation.
  - (4) Blast media shall be stored in a manner to prevent it from escaping into the atmosphere via wind erosion.
  - (5) Cleanup from outdoor abrasive blasting operations shall be performed through wet cleaning methods or vacuums equipped with appropriate filters.
  - (6) Outdoor abrasive blasting operators shall be trained on operating techniques and procedures to reduce fugitive emissions from outdoor abrasive blasting operations.

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

**D.3.3 Record Keeping Requirements - Fugitive Control Measures [326 IAC 6-5]**

Pursuant to 326 IAC 6-5-5(b), records shall be kept and maintained which document all control measures and activities to be implemented in accordance with Condition D.3.2. Said records shall be available upon the request of the commissioner, and shall be retained for three (3) years.

**SECTION D.4 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(14)]:**

**Insignificant Activities:**

- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million

**SECTION D.4**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(14)]:**

**Insignificant Activities:**

**(10,000,000) British thermal units per hour, including the following:**

- (1) Two (2) natural gas fired water-dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]**
- (2) Two (2) natural gas fired pre-dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]**
- (3) Two (2) natural gas fired dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]**
- (4) Two (2) natural gas fired furnaces, with a maximum heat input capacity of 3.0 MMBtu/hr. [326 IAC 6.5-1]**

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

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.4.1 Particulate [326 IAC 6.5-1-2]**

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the two (2) natural gas fired furnaces, the two (2) natural gas fired water-dry ovens, the two (2) natural gas fired pre-dry ovens, and the two (2) natural gas fired dry ovens shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf) of natural gas burned each.

**SECTION D.5**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(14)]:**

**Insignificant Activities:**

- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. [326 IAC 8-4-6]**

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

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.5.1 Gasoline Dispensing Facilities [326 IAC 8-4-6]**

Pursuant to 326 IAC 8-4-6(b), the Stage I vapor recovery system requirements at the gasoline dispensing facility are as follows:

- (a) No owner or operator of a gasoline dispensing facility shall allow the transfer of gasoline between any transport and any storage tank unless the tank is equipped with the following:**

- (1) A submerged fill pipe that extends to not more than:
    - (A) twelve (12) inches from the bottom of the storage tank if the fill pipe was installed on or before November 9, 2006; or
    - (B) six (6) inches from the bottom of the storage tank if the fill pipe was installed after November 9, 2006.
  - (2) Either a pressure relief valve set to release at not less than seven-tenths (0.7) pounds per square inch or an orifice of five-tenths (0.5) inch in diameter.
  - (3) A vapor balance system connected between the tank and the transport, operating according to manufacturer's specifications.
- (b) If the owner or employees of the owner of a gasoline dispensing facility are not present during loading, it shall be the responsibility of the owner or the operator of the transport to make certain the vapor balance system is:
- (1) connected between the transport and the storage tank; and
  - (2) operating according to manufacturer's specifications.

#### SECTION D.6

#### FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(14)]:**

**Insignificant Activities:**

- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

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

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]**

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements; and
- (f) Store waste solvent only in covered containers and not dispose of waste solvent

or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### **D.6.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]**

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- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following operating requirements are met:

- (1) Close the cover whenever articles are not being handled in the degreaser.
- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**D.6.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]**

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Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaning Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

**D.6.4 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.6.3, the Permittee shall maintain the following records for each purchase of solvent. These records shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
  - (1) The name and address of the solvent supplier.
  - (2) The date of purchase.
  - (3) The type of solvent.
  - (4) The volume of each unit of solvent.
  - (5) The total volume of the solvent.
  - (6) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

**Section E.1 of the Permit**

Section E.1 of the permit was added to incorporate the applicable provisions of 40 CFR 63, Subpart II. The entire rule is included as Attachment B to the permit.

The permit has been revised as follows:

**SECTION E.1 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(14)]:**

**(b) Surface coating operations consisting of the following:**

- (1) Two (2) spray booths, identified as EU-02, for the application of weld-through (shop) primer when performing shipbuilding, with a maximum capacity of 600 marine vessels per year with emissions controlled by paint arrestor pads, identified as PA1 and PA2. Unit No. 1 was constructed in 1980. Unit No. 2 was constructed in 1970. Under 40 CFR 63, Subpart II, this is considered shipbuilding and repair.**
- (2) Outdoor spray operations, identified as EU-03, constructed in 1939, consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications, with a maximum capacity of 600 marine vessels per year. A portion of the outdoor spray operations are conducted under cover that was installed in 2006. Under 40 CFR 63, Subpart II, this is considered shipbuilding and repair.**

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

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

**E.1.1 General Provisions Relating to NESHAP II [326 IAC 20-1-1][40 CFR Part 63, Subpart A]**

Pursuant to 40 CFR 63.780, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 1 of 40 CFR 63, Subpart II in accordance with the schedule in 40 CFR 63, Subpart II.

**E.1.2 Shipbuilding and Ship Repair (Surface Coating) NESHAP [40 CFR 63, Subpart II][326 IAC 20-26]**

The Permittee which engages in shipbuilding and ship repair is subject to the following provisions of 40 CFR 63, Subpart II, which is incorporated by reference as 326 IAC 20-26-1 (included as Attachment B of the permit):

- (1) 40 CFR 63.780;**
- (2) 40 CFR 63.781;**
- (3) 40 CFR 63.782;**
- (4) 40 CFR 63.783;**
- (5) 40 CFR 63.784(a);**
- (6) 40 CFR 63.785(a), (b), (c)(1)-(c)(3), (d);**
- (7) 40 CFR 63.786(a), (c), (d);**
- (8) 40 CFR 63.787;**
- (9) 40 CFR 63.788;**
- (10) 40 CFR 63.789;**
- (11) Table 1 to Subpart II of 40 CFR 63;**
- (12) Table 2 to Subpart II of 40 CFR 63;**
- (13) Table 3 to Subpart II of 40 CFR 63.**

### **Changes to the Forms of the Permit**

The following is a summary of the changes that have been made to the forms at the end of the permit:

- (a) IDEM, OAQ has decided to remove the last sentence dealing with the need for certification from the forms because the Conditions requiring the forms already address this issue.
- (b) The phrase "of this permit" has been added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report to match the underlying rule.

### **Recommendation**

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on May 26, 2010. Additional information was received on January 21, 2011, March 28, 2011, May 10, 2011, July 18, 2011, July 29, 2011, August 12, 2011, and August 29, 2011.

### **Conclusion**

The operation of this shipbuilding and repair source shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T019-29304-00006.

### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Laura Spriggs 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) 233-5693 or toll free at 1-800-451-6027 extension 5693.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

Summary

Emission Unit	Uncontrolled PTE (ton/yr)								
	PM	PM10	PM2.5	VOC	SO2	CO	NOx	Total HAPs	GHGs (CO2e)
EU-01: Pangborn Shot Blast Unit	1830.2	1574.0	1574.0	--	--	--	--	23.79	--
EU-01: Wheelabrator Shot Blast Unit	1689.4	1452.9	1452.9	--	--	--	--	21.96	--
EU-02: Spray Booth No. 1	145.2	145.2	145.2	--	--	--	--	--	--
EU-02: Spray Booth No. 2	145.2	145.2	145.2	--	--	--	--	--	--
Fugitive Emissions									
EU-03: Outdoor Spray Operations	432.2	432.2	432.2	391.7	--	--	--	120.9	--
EU-04: Welding Operations	40.2	40.2	40.2	--	--	--	--	34.50	1246.01
EU-05: Flame and Plasma Cutting*	93.8	93.8	93.8	--	--	--	--	0.35	**
EU-06: Four Abrasive Outdoor Blasting Units	1594.3	227.8	22.8	--	--	--	--	**	--
Paved and Unpaved Roads	**	**	**	--	--	--	--	--	--
Insignificant Activities									
Natural Gas Combustion	0.10	0.39	0.39	0.28	0.03	4.33	5.15	0.10	6196.24
Gasoline Fuel Transfer and Dispensing Operation	--	--	--	**	--	--	--	**	--
Degreasing Operations	--	--	--	**	--	--	--	**	--
Total (fugitives only counted for HAPs)	3810.2	3317.7	3317.7	0.3	0.03	4.3	5.2	201.59	7442.25

Emission Unit	Controlled PTE (ton/yr)								
	PM	PM10	PM2.5	VOC	SO2	CO	NOx	Total HAPs	GHGs (CO2e)
EU-01: Pangborn Shot Blast Unit	7.32	6.30	15.74	--	--	--	--	0.10	--
EU-01: Wheelabrator Shot Blast Unit	6.76	5.81	14.53	--	--	--	--	0.09	--
EU-02: Spray Booth No. 1	1.45	1.45	1.45	--	--	--	--	--	--
EU-02: Spray Booth No. 2	1.45	1.45	1.45	--	--	--	--	--	--
Fugitive Emissions									
EU-03: Outdoor Spray Operations	432.2	432.2	432.2	391.7	--	--	--	120.9	--
EU-04: Welding Operations	40.2	40.2	40.2	--	--	--	--	34.50	1246.01
EU-05: Flame and Plasma Cutting*	93.8	93.8	93.8	--	--	--	--	0.35	**
EU-06: Four Abrasive Outdoor Blasting Units	797.2	79.7	8.0	--	--	--	--	**	--
Paved and Unpaved Roads	**	**	**	--	--	--	--	--	--
Insignificant Activities									
Natural Gas Combustion	0.10	0.39	0.39	0.28	0.03	4.33	5.15	0.10	6196.24
Gasoline Fuel Transfer and Dispensing Operation	--	--	--	**	--	--	--	**	--
Degreasing Operations	--	--	--	**	--	--	--	**	--
Total (fugitives only counted for HAPs)	17.1	15.4	33.6	0.3	0.03	4.3	5.2	156.01	7442.25

Emission Unit	Limited PTE (ton/yr)								
	PM	PM10	PM2.5	VOC	SO2	CO	NOx	Total HAPs	GHGs (CO2e)
EU-01: Pangborn Shot Blast Unit	39.7	39.7	39.7	--	--	--	--	23.79	--
EU-01: Wheelabrator Shot Blast Unit	39.7	39.7	39.7	--	--	--	--	21.96	--
EU-02: Spray Booth No. 1	10	10	10	--	--	--	--	--	--
EU-02: Spray Booth No. 2	10	10	10	--	--	--	--	--	--
Fugitive Emissions									
EU-03: Outdoor Spray Operations	432.2	432.2	432.2	391.7	--	--	--	120.9	--
EU-04: Welding Operations	40.2	40.2	40.2	--	--	--	--	34.50	1246.01
EU-05: Flame and Plasma Cutting*	93.8	93.8	93.8	--	--	--	--	0.35	**
EU-06: Four Abrasive Outdoor Blasting Units	1594.3	227.8	22.8	--	--	--	--	**	--
Paved and Unpaved Roads	**	**	**	--	--	--	--	--	--
Insignificant Activities									
Natural Gas Combustion	0.10	0.39	0.39	0.28	0.03	4.33	5.15	0.10	6196.24
Gasoline Fuel Transfer and Dispensing Operation	--	--	--	**	--	--	--	**	--
Degreasing Operations	--	--	--	**	--	--	--	**	--
Total (fugitives only counted for HAPs)	99.5	99.8	99.8	0.28	0.03	4.33	5.15	201.59	7442.25

\*Emissions taken from Part 70 Operating Permit Renewal No. T019-18066-00006

\*\*Calculations not provided or emissions not estimated. The emissions that were not calculated are not expected to trigger the exceedance of any thresholds.

EU-01 - Blasting Emissions

Emission Unit	Baghouse ID	Baghouse Air Flow (acfm) [1]	Outlet PM Grain Loading (gr/acfm) [1]	Baghouse Control Efficiency (PM/PM10/Mn) [1]	Baghouse Control Efficiency (PM2.5) [2]	Controlled PTE PM (ton/yr) [3]	Uncontrolled PTE PM (ton/yr) [4]	Uncontrolled PTE PM10/PM2.5 (ton/yr) [5]	Controlled PTE PM10 (ton/yr) [6]	Controlled PTE PM2.5 (ton/yr) [6]	Uncontrolled PTE Mn (ton/yr) [7]	Controlled PTE Mn (ton/yr) [6]
Shotblast #1 (Pangborn)	BH-1	13000	0.015	99.6%	99.0%	7.32	1830.21	1573.98	6.30	15.74	23.79	0.10
Shotblast #2 (Wheelabrator)	BH-2	12000	0.015	99.6%	99.0%	6.76	1689.43	1452.91	5.81	14.53	21.96	0.09
<b>Total</b>						<b>14.08</b>	<b>3519.64</b>	<b>3026.89</b>	<b>12.11</b>	<b>30.27</b>	<b>45.76</b>	<b>0.18</b>

Methodology

[1] Design

[2] PM2.5 Control Efficiency assumed to be lower than PM/PM10/Mn

[3] Controlled PTE PM (ton/yr) = Baghouse Air Flow (acfm) x Outlet PM Grain Loading (gr/acfm) x (60 min/hr) x (8760 hr/yr) x (1 lb/7000 gr) x (1 ton/2000 lb)

[4] Uncontrolled PTE PM (ton/yr) = Controlled PTE PM (ton/yr) / (1 - Baghouse Control Efficiency)

[5] Uncontrolled PTE PM10/PM2.5 (ton/yr) = Uncontrolled PTE PM (ton/yr) x 0.86 ton PM10/ton PM; Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition); PM2.5 assumed to equal PM10

[6] Controlled PTE (ton/yr) = Uncontrolled PTE (ton/yr) x (1 - Control Efficiency)

[7] Uncontrolled PTE MN (ton/yr) = Uncontrolled PTE PM (ton/yr) x 0.013 ton Mn/ton PM; the Mn fraction is based conservatively on the MSDS from the steel shot

EU-02 and EU-03 - Coating Emissions

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/year)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (ton/yr)	Uncontrolled PTE PM/PM10/PM2.5 (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Particulate Control Efficiency	Controlled PTE PM/PM10/PM2.5 (ton/yr)
<b>EU-02: Spray Booth #1</b>																
Preprime Part A (Potassium Silicate, PC-1200, 8-1805072)	9.2	73.00%	73.0%	0.0%	73.0%	27.00%	97.6	600.0	0.00	0.00	0.00	18.13	0.00	75%	99%	0.18
Preprime Part B (zinc dust, PC-1201, 8-1805096)	48.5	0.00%	0.0%	0.0%	0.0%	100.00%	35.0	600.0	0.00	0.00	0.00	127.09	0.00	75%	99%	1.27
<b>EU-02: Spray Booth #2</b>																
Preprime Part A (Potassium Silicate, PC-1200, 8-1805072)	9.2	73.00%	73.0%	0.0%	73.0%	27.00%	97.6	600.0	0.00	0.00	0.00	18.13	0.00	75%	99%	0.18
Preprime Part B (zinc dust, PC-1201, 8-1805096)	48.5	0.00%	0.0%	0.0%	0.0%	100.00%	35.0	600.0	0.00	0.00	0.00	127.09	0.00	75%	99%	1.27
<b>EU-03: Outdoor Spray Operations</b>																
Devoe Haze Gray Base (8-1802222)	11.85	20.5%	0.0%	20.5%	0.0%	65.56%	538.2	600.0	2.43	2.43	391.75	395.56	3.70	74%	0%	395.56
Devoe Black (8-1802441)	11.69	19.9%	0.0%	19.9%	0.0%	66.55%	538.2	600.0	2.33	2.33	376.36	392.85	3.50	74%	0%	392.85
Valspar Grey (8-1807444)	12.27	16.1%	0.0%	16.1%	0.0%	72.38%	538.2	600.0	1.98	1.98	319.31	432.21	2.73	74%	0%	432.21
Devoe Buff Base (8-1805235)	11.83	20.2%	0.0%	20.2%	0.0%	66.03%	538.2	600.0	2.39	2.39	386.06	396.20	3.62	74%	0%	396.20
Devoe Oxide Red Base (8-1802350)	11.85	20.3%	0.0%	20.3%	0.0%	65.72%	538.2	600.0	2.40	2.41	389.54	396.69	3.65	74%	0%	396.69
Worst Case for EU-03											391.75	432.21				
<b>Total</b>											<b>391.75</b>	<b>722.65</b>				<b>435.12</b>

Methodology

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
 Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/yr) \* (1 ton/2000 lbs)  
 Particulate Potential Tons per Year = (units/yr) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \* (1 ton/2000 lbs)  
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
 Gallons of Material per Unit is based on volume of coatings used in 1995 for 235 barges

Material	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum (unit/year)	Weight % Ethylbenzene	Weight % Xylene	Weight % Formaldehyde	Ethylbenzene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Total HAPs (ton/yr)
<b>EU-02: Spray Booth #1</b>										
Preprime Part A (Potassium Silicate, PC-1200, 8-1805072)	9.2	97.6	600.0				0.00	0.00	0.00	0.00
Preprime Part B (zinc dust, PC-1201, 8-1805096)	48.5	35.0	600.0				0.00	0.00	0.00	0.00
<b>EU-02: Spray Booth #2</b>										
Preprime Part A (Potassium Silicate, PC-1200, 8-1805072)	9.2	97.6	600.0				0.00	0.00	0.00	0.00
Preprime Part B (zinc dust, PC-1201, 8-1805096)	48.5	35.0	600.0				0.00	0.00	0.00	0.00
<b>EU-03: Outdoor Spray Operations</b>										
Devoe Haze Gray Base (8-1802222)	11.85	538.2	600.0				0.00	0.00	0.00	0.00
Devoe Black (8-1802441)	11.69	538.2	600.0				0.00	0.00	0.00	0.00
Valspar Grey (8-1807444)	12.27	538.2	600.0	1.00%	5.00%	0.10%	19.82	99.08	1.98	120.88
Devoe Buff Base (8-1805235)	11.83	538.2	600.0				0.00	0.00	0.00	0.00
Devoe Oxide Red Base (8-1802350)	11.85	538.2	600.0				0.00	0.00	0.00	0.00
Worst Case for EU-03							19.82	99.08	1.98	120.88

"Worst Case" Individual HAP 99.1  
 "Worst Case" Total HAPs 120.9

Methodology

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

EU-04 - Welding Emissions

Welding Process and Electrode Type	Class	WM#	Total Actual Electrode Weight (lb/yr)	%Waste	Actual Electrode Consumed (lb/yr)	Potential Electrode Consumed (lb/yr)	EMISSION FACTORS*						EMISSIONS						HAPs (lb/hr)
							(lb pollutant/1000 lb electrode consumed)						(lbs/hr)						
							PM/PM10/PM2.5	Cr	Co	Mn	Ni	Pb	PM/PM10/PM2.5	Cr	Co	Mn	Ni	Pb	
<b>Shielded Metal Arc Welding (SMAW)</b>																			
E308	308	1087	7,216	30%	5051.2	15951.2	10.8	7.52	0.01	2.52	0.43		0.020	1.37E-02	1.82E-05	4.59E-03	7.83E-04	0.00E+00	0.019
E309**	309	1058	10,760	30%	7532	23785.3	38.4	44.1	0.01	22	1.96	1.62	0.104	1.20E-01	2.72E-05	5.97E-02	5.32E-03	4.40E-03	0.189
E316	316	1087	0	30%	0	0	10.0	8.54		5.44	0.55		0.000	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.000
E6010	6010	1006	71,150	30%	49805	157278.9	25.6	0.04		9.91	0.04		0.460	7.18E-04	0.00E+00	1.78E-01	7.18E-04	0.00E+00	0.179
E6011	6011	1007	103,550	30%	72485	228900.0	38.4	0.05	0.01	9.98	0.05		1.003	1.31E-03	2.61E-04	2.61E-01	1.31E-03	0.00E+00	0.264
E6013	6013	1008	25	30%	17.5	55.3	19.7	0.04	0.01	9.45	0.02		0.000	2.52E-07	6.31E-08	5.96E-05	1.26E-07	0.00E+00	0.000
E6027**	6027	1004	94,000	30%	65800	207789.5	38.4	44.1	0.01	22	1.96	1.62	0.911	1.05E+00	2.37E-04	5.22E-01	4.65E-02	3.84E-02	1.653
E7018	7018	1027	11,150	30%	7805	24647.4	18.4	0.06	0.01	10.3	0.02		0.052	1.69E-04	2.81E-05	2.90E-02	5.63E-05	0.00E+00	0.029
E7024	7024	1005	115,300	30%	80710	254873.7	9.2	0.01		6.29			0.268	2.91E-04	0.00E+00	1.83E-01	0.00E+00	0.00E+00	0.183
E7024-1**	7024-1	1004	143,150	30%	100205	316436.8	38.4	44.1	0.01	22	1.96	1.62	1.387	1.59E+00	3.61E-04	7.95E-01	7.08E-02	5.85E-02	2.517
<b>Flux Cored Arc Welding (FCAW)</b>																			
E71T	71M	1080	199,502	15%	169576.7	535505.4	12.2	0.02	0.01	6.62	0.04		0.746	1.22E-03	6.11E-04	4.05E-01	2.45E-03	0.00E+00	0.409
E70T	AWSL12	1034	29,100	15%	24735	78110.5	15.1	0.04		8.91	0.05		0.135	3.57E-04	0.00E+00	7.94E-02	4.46E-04	0.00E+00	0.080
E71T	FABCO	1065	10,020	15%	8517	26895.8	12.2	0.02	0.01	6.62	0.04		0.037	6.14E-05	3.07E-05	2.03E-02	1.23E-04	0.00E+00	0.021
E70T	NR131	1088	0	15%	0	0.0	15.1	0.04		8.91	0.05		0.000	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.000
E71T	NR232	1011	464,825	15%	395101.25	1247688.2	12.2	0.02	0.01	6.62	0.04		1.738	2.85E-03	1.42E-03	9.43E-01	5.70E-03	0.00E+00	0.953
E70T	NR305	1091	494,400	15%	420240	1327073.7	15.1	0.04		8.91	0.05		2.288	6.06E-03	0.00E+00	1.35E+00	7.57E-03	0.00E+00	1.363
E70T	NR 233		6,000	15%	5100	16105.3	15.1	0.04		8.91	0.05		0.028	7.35E-05	0.00E+00	1.64E-02	9.19E-05	0.00E+00	0.017
<b>Submerged Arc Welding (SAW)</b>																			
EL12	L56	1095	6,968	15%	5922.8	18703.6	0.05						1.07E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.000
EL12	L-60	1025	25,600	15%	21760	68715.8	0.05						3.92E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.000
EM12K	L61	1085	220,800	15%	187680	592673.7	0.05						3.38E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.000
WM1093	LC-72		16,850	15%	14322.5	45228.9	0.05						2.58E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.000
E70C-6M	MC706		143,031	15%	121576.35	383925.3	0.05						2.19E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.000
<b>Total (lb/hr)</b>													<b>9.18</b>	<b>2.79</b>	<b>0.003</b>	<b>4.85</b>	<b>0.14</b>	<b>0.10</b>	<b>7.88</b>
<b>Total (ton/yr)</b>													<b>40.22</b>	<b>12.20</b>	<b>0.01</b>	<b>21.22</b>	<b>0.62</b>	<b>0.44</b>	<b>34.50</b>

Methodology

\*Emission Factors are from AP-42, Chapter 12.19, Tables 12.19-1 and 12.19-2

\*\*Emission Factors for this type of electrode was not included in AP-42. Emission Factors are conservative based on other electrodes reported in AP-42.

Total Actual Electrode Weight is as reported by Permittee

Actual Electrode Consumed (lb/yr) = Total Actual Electrode Weight (lb/yr) x (1 - %Waste)

Potential Electrode Consumed (lb/yr) = Actual Electrode Consumed (lb/yr) x (600 Potential Ships/yr) / (190 Actual Ships/yr)

Welding emissions (lb/hr) = (Potential Electrode Consumed (lb/yr) x (emission factor (lb pollutant/1000 lb of electrode used))) x (1 yr/8760 hr) / 1000

Emissions (ton/yr) = Emissions (lb/hr) x (8760 hr/yr) x (1 ton/2000 lb)

Note: These represent indoor welding emissions as well as outdoor fugitive welding emissions. The Permittee did not separate out the indoor (EU-08) from the outdoor (EU-04) welding operation

EU-04 - GHG Emissions from Welding

2010 Actual Emissions

Welding Gas	# Tanks	Weight per tank (lbs)	2010 Usage (tons/yr)	CO2	N2O	CH4	GHG Mass-Based	CO2e
Welder Supply Cryogenic (Liquid) Carbon Dioxide	220	387.000	42.57	42.57			42.57	42.57
Linde Liquid Carbon Dioxide			352.00	352.00			352.00	352.00
<b>Total</b>				<b>394.57</b>	<b>0.00</b>	<b>0.00</b>	<b>394.57</b>	<b>394.57</b>

Potential Emissions

Welding Gas	# Tanks	Weight per tank (lbs)	Potential Usage (tons/yr)	CO2	N2O	CH4	GHG Mass-Based	CO2e
Welder Supply Cryogenic (Liquid) Carbon Dioxide	220	387.000	134.43	134.43			134.43	134.43
Linde Liquid Carbon Dioxide			1111.58	1111.58			1111.58	1111.58
<b>Total</b>				<b>1246.01</b>	<b>0.00</b>	<b>0.00</b>	<b>1246.01</b>	<b>1246.01</b>

Methodology

Emission estimation methodology based on:

DARCO Industries Inc., Voluntary Challenge and Registry Action Plan for Reducing Greenhouse Gas Emissions

<http://www.ghgregistries.ca/registry/out/C5562-DACRO-04-PDF.PDF>

GHGs:

GHG Mass-Based (ton/yr) = CO2 (ton/yr) + N2O (ton/yr) + CH4 (ton/yr)

$$CO2e = \sum_{i=1}^n GHG_i \cdot GWP_i$$

Where:

CO2e = carbon dioxide equivalent (ton/yr)

GHGi = mass emission rate of each greenhouse gas (ton/yr)

GWPi = global warming potential for each greenhouse gas

n = number of greenhouse gases emitted

GWPs from 40 CFR 98, Subpart A, Table A-1: 1 for CO2, 21 for CH4, 310 for N2O

**TSD Appendix A: Emissions Calculations**

***EU-06 - Blasting Emissions***

Maximum Usage (lb/hr)	PM Emission Factor (lb/1000 lb)	PM10 Emission Factor (lb/1000 lb)	PM2.5 Emission Factor (lb/1000 lb)	Uncontrolled PM (ton/yr)	Uncontrolled PM10 (ton/yr)	Uncontrolled PM2.5 (ton/yr)	PM Control Efficiency (%)	PM10/PM2.5 Control Efficiency (%)	Controlled PM (ton/yr)	Controlled PM10 (ton/yr)	Controlled PM2.5 (ton/hr)
4,000	91	13	1.3	1594.3	227.8	22.8	50%	65%	797.2	79.7	8.0

***Methodology***

Maximum Usage (lb/hr) based on four units operating at 1,000 lb/hr each

PM, PM10, and PM2.5 Emission Factors from AP-42, Compilation of Air Emission Factors, Chapter 13.2.6, Table 13.2.6-1

Uncontrolled Emissions (ton/yr) = Maximum Usage (lb/hr) \* (8760 hr/yr) \* Emission Factor (lb/1000 lb) \* (1 ton/2000 lb) / 1000

Controlled Emissions (ton/yr) = Uncontrolled Emissions (ton/yr) \* (1 - Control Efficiency)

Control based on dust suppressant manufacturer's estimate

Natural Gas Combustion (< 100 MMBtu/hr)

			Criteria Pollutants						GHGs					
			PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO	CO2	N2O	CH4	GHG Mass-Based	CO2e
Emission Factor in lb/MMCF			1.9	7.6	7.6	0.6	100.0	5.5	84.0	120000	0.64	2.3		
							**see below							
Emission Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)											
Water-Dry Oven	1	8.588	0.008	0.033	0.033	0.003	0.429	0.024	0.361	515.29	0.00	0.01	515.31	516.35
Water-Dry Oven	1	8.588	0.008	0.033	0.033	0.003	0.429	0.024	0.361	515.29	0.00	0.01	515.31	516.35
Pre-Dry Oven	1	8.588	0.008	0.033	0.033	0.003	0.429	0.024	0.361	515.29	0.00	0.01	515.31	516.35
Pre-Dry Oven	1	8.588	0.008	0.033	0.033	0.003	0.429	0.024	0.361	515.29	0.00	0.01	515.31	516.35
Dry Oven	1	8.588	0.008	0.033	0.033	0.003	0.429	0.024	0.361	515.29	0.00	0.01	515.31	516.35
Dry Oven	1	8.588	0.008	0.033	0.033	0.003	0.429	0.024	0.361	515.29	0.00	0.01	515.31	516.35
Furnace	3	25.765	0.024	0.098	0.098	0.008	1.288	0.071	1.082	1545.88	0.01	0.03	1545.92	1549.06
Furnace	3	25.765	0.024	0.098	0.098	0.008	1.288	0.071	1.082	1545.88	0.01	0.03	1545.92	1549.06
Total			0.10	0.39	0.39	0.03	5.15	0.28	4.33	6183.53	0.03	0.12	6183.68	6196.24

Emission Factors are from AP-42, Tables 1.4-1 and 1.4-2.

\*PM emission factor is filterable PM only. PM10 and PM2.5 emission factors are filterable and condensable particulate combined.

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

			HAPs - Organics					HAPs - Metals					Total HAPs
			Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMCF			2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	1.8880
Emission Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)										
Water-Dry Oven	1	8.588	9.0E-06	5.2E-06	3.2E-04	7.7E-03	1.5E-05	2.1E-06	4.7E-06	6.0E-06	1.6E-06	9.0E-06	8.1E-03
Water-Dry Oven	1	8.588	9.0E-06	5.2E-06	3.2E-04	7.7E-03	1.5E-05	2.1E-06	4.7E-06	6.0E-06	1.6E-06	9.0E-06	8.1E-03
Pre-Dry Oven	1	8.588	9.0E-06	5.2E-06	3.2E-04	7.7E-03	1.5E-05	2.1E-06	4.7E-06	6.0E-06	1.6E-06	9.0E-06	8.1E-03
Pre-Dry Oven	1	8.588	9.0E-06	5.2E-06	3.2E-04	7.7E-03	1.5E-05	2.1E-06	4.7E-06	6.0E-06	1.6E-06	9.0E-06	8.1E-03
Dry Oven	1	8.588	9.0E-06	5.2E-06	3.2E-04	7.7E-03	1.5E-05	2.1E-06	4.7E-06	6.0E-06	1.6E-06	9.0E-06	8.1E-03
Dry Oven	1	8.588	9.0E-06	5.2E-06	3.2E-04	7.7E-03	1.5E-05	2.1E-06	4.7E-06	6.0E-06	1.6E-06	9.0E-06	8.1E-03
Furnace	3	25.765	2.7E-05	1.5E-05	9.7E-04	2.3E-02	4.4E-05	6.4E-06	1.4E-05	1.8E-05	4.9E-06	2.7E-05	2.4E-02
Furnace	3	25.765	2.7E-05	1.5E-05	9.7E-04	2.3E-02	4.4E-05	6.4E-06	1.4E-05	1.8E-05	4.9E-06	2.7E-05	2.4E-02
Total			1.1E-04	6.2E-05	3.9E-03	9.3E-02	1.8E-04	2.6E-05	5.7E-05	7.2E-05	2.0E-05	1.1E-04	9.7E-02

Emission Factors are from AP-42, Tables 1.4-3 and 1.4-4.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Methodology

Heating Value of Natural Gas is assumed to be 1020 MMBtu/MMCF

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) \* 8,760 hrs/yr \* 1 MMCF/1,020 MMBtu

Potential Emission (tons/yr) = Throughput (MMCF/yr) \* Emission Factor (lb/MMCF) \* (1 ton/2,000 lb)

GHGs:

GHG Mass-Based (ton/yr) = CO2 (ton/yr) + N2O (ton/yr) + CH4 (ton/yr)

$$CO2e = \sum_{i=1}^n GHG_i \cdot GWPI_i$$

Where: CO2e = carbon dioxide equivalent (ton/yr)

GHGi = mass emission rate of each greenhouse gas (ton/yr)

GWPI = global warming potential for each greenhouse gas

n = number of greenhouse gases emitted

GWPs from 40 CFR 98, Subpart A, Table A-1: 1 for CO2, 21 for CH4, 310 for N2O



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Commissioner**

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

TO: Roy Martin  
Jeffboat, LLC  
1030 E Market St  
Jeffersonville, IN 47130

DATE: December 5, 2011

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

SUBJECT: Final Decision  
Title V - Renewal  
019-29304-00006

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:  
Kenneth Martin (VP – Operations)  
Kathy Moore (KERAMIDA Environmental, Inc)  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

*Thomas W. Easterly*  
**Commissioner**

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

December 5, 2011

TO: Jefferson Township Public Library

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

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

**Applicant Name: Jeffboat, LLC**  
**Permit Number: 019-29304-00006**

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	MIDENNEY 12/5/2011 Jeffboat, LLC 019-29304-00006 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Roy Martin Jeffboat, LLC 1030 E Market St Jeffersonville IN 47130 (Source CAATS) via confirm delivery										
2		Kenneth Martin VP Operations Jeffboat, LLC 1030 E Market St Jeffersonville IN 47130 (RO CAATS)										
3		Ms. Rhonda England 17213 Persimmon Run Rd Borden IN 47106-8604 (Affected Party)										
4		Ms. Betty Hislip 602 Dartmouth Drive, Apt 8 Clarksville IN 47129 (Affected Party)										
5		Mrs. Sandy Banet 514 Haddox Rd Henryville IN 47126 (Affected Party)										
6		Jeffersonville City Council and Mayors Office 500 Quarter Master Jeffersonville IN 47130 (Local Official)										
7		Jeffersonville Twp Public 211 E Court Ave, P.O. Box 1548 Jeffersonville IN 47131-1548 (Library)										
8		Mr. Robert Bottom Paddlewheel Alliance P.O. Box 35531 Louisville KY 40232-5531 (Affected Party)										
9		Clark County Board of Commissioners 501 E. Court Avenue Jeffersonville IN 47130 (Local Official)										
10		Clark County Health Department 1320 Duncan Avenue Jeffersonville IN 47130-3723 (Health Department)										
11		Mrs. Kathy Moore KERAMIDA Environmental, Inc. 401 North College Indianapolis IN 46202 (Consultant)										
12												
13												
14												
15												

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<b>10</b>			