



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: March 7, 2013

RE: White Flyers Targets / 149-32378-00027

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot12/03/07



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Tim Gunter
White Flyer Targets
317 Kloeckner Drive
Knox, IN 46534

Re: 149-32378-00027
First Significant Revision to
M149-28339-00027

Dear Tim Gunter:

White Flyer Targets was issued Minor Source Operating Permit (MSOP) No. M149-28339-00027 on October 28, 2009 for a stationary sporting goods manufacturing plant located at 317 Kloeckner Drive, Knox, IN 46534.

On October 3, 2012, the Office of Air Quality (OAQ) received an application from the source requesting the addition of the following:

- (a) One (1) enclosed dry material #1 storage tank, identified as P012, with a storage capacity of 2475 cubic feet, a maximum throughput of 8760 tons per year, approved in 2013 for construction, with emissions vented through a pulse-jet cleaning dust collector to stack S10.
- (b) One (1) enclosed dry material #2 storage tank, identified as P013, with a storage capacity of 1701 cubic feet, a maximum throughput of 958 tons per year, approved in 2013 for construction, with emissions vented through a pulse-jet cleaning dust collector to stack S11.
- (c) One (1) enclosed dry material #3 storage tank, identified as P014, with a storage capacity of 600 cubic feet, a maximum throughput of 9960 tons per year, approved in 2013 for construction, with emissions vented through a pulse-jet cleaning dust collector to stack S12.
- (d) Three (3) supersack and/or silo enclosed indoor dry material dump stations, identified as P018a, P018b, and P018c, approved in 2013 for construction, with dust control systems vented to stack S13.
- (e) One (1) enclosed dry mixer, identified as P015, with a storage capacity of 1350 gallons, a maximum throughput of 9960 tons per year, approved in 2013 for construction, with the mixed material pneumatically conveyed into a storage hopper, vented to stack S08 and through a baghouse to stack S13.
- (f) One (1) enclosed heated (hot oil heater) liquid storage tank not containing any HAPs or VOCs, identified as P010, with a capacity of 18,000 gallons, a maximum throughput of 32,850 tons per year, approved in 2013 for construction. Emissions are vented through a wet scrubber and filter system to stack S08.
- (g) One (1) enclosed heated (from hot oil heater) and agitated mix tank, identified as P011, with a capacity of 2600 gallons, a maximum throughput of 19,710 tons per year, approved in 2013 for construction, with emissions vented through a wet scrubber and filter system to stack 09.

- (h) One (1) enclosed heated (from hot oil heater) process tank, identified as P021, with a capacity of 450 gallons, a maximum throughput of 19,710 tons per year, approved in 2013 for construction, with emissions vented through a wet scrubber and filter system to stack 09.
- (i) One (1) heated (from hot oil heater) and agitated Remelt tank, identified as P022, with a capacity of 1055 gallons, a maximum throughput of 8760 tons per year, approved in 2013 for construction, with wet scrubber and filter system as a control device, vented inside the building.
- (j) One (1) pneumatically operated water cooled molding process, identified as P017, approved in 2013 for construction, vented inside the building. There are no expected emissions from this process.
- (k) Two (2) paint spray booths, identified as P016a and P016b, approved in 2013 for construction, each equipped with eight (8) air atomized spray guns, with a combined maximum capacity of 158,352 units per day, using dry filters for particulate control and exhausting to stack S14.
- (l) Paved and unpaved roads.

The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-6.1-6, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-6.1-6(i). Pursuant to the provisions of 326 IAC 2-6.1-6, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Susann Brown, of my staff, at 317-234-5176 or 1-800-451-6027, and ask for extension 4-5176.

Sincerely,



Chrystal Wagner, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

CW/SB

cc: File - Starke County
Starke County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section



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Minor Source Operating Permit OFFICE OF AIR QUALITY

**White Flyer Targets
317 Kloeckner Drive
Knox, Indiana 46534**

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

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

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

Operation Permit No.: M149-28339-00027	
Original signed by: Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: October 28, 2009 Expiration Date: October 28, 2014

First Significant Permit Revision No. 149-32378-00027	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 7, 2013 Expiration Date: October 28, 2014

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary sporting goods manufacturing plant.

Source Address:	317 Kloeckner Drive, Knox, Indiana 46534
General Source Phone Number:	570-644-0453
SIC Code:	3949
County Location:	Starke
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) hot oil heater, identified as P08, constructed in 2005, rated at 2.5 MMBtu per hour;
- (b) Two (2) enclosed dry material #1 storage silos and conveyors, identified as P03 and P04, constructed in 2005, each with a storage capacity of 2475 cubic feet and each with a maximum throughput of 26500 tons per year, both using baghouses as particulate control, and exhausting to stacks S03, S04 and S05;
- (c) One (1) enclosed dry material #1 storage tank, identified as P012, with a storage capacity of 2475 cubic feet, a maximum throughput of 8760 tons per year, approved in 2013 for construction, with emissions vented through a pulse-jet cleaning dust collector to stack S10.
- (d) One (1) enclosed dry material #2 storage tank, identified as P013, with a storage capacity of 1701 cubic feet, a maximum throughput of 958 tons per year, approved in 2013 for construction, with emissions vented through a pulse-jet cleaning dust collector to stack S11.
- (e) One (1) enclosed dry material #3 storage tank, identified as P014, with a storage capacity of 600 cubic feet, a maximum throughput of 9960 tons per year, approved in 2013 for construction, with emissions vented through a pulse-jet cleaning dust collector to stack S12.
- (f) Three (3) supersack and/or silo enclosed indoor dry material dump stations, identified as P018a, P018b, and P018c, approved in 2013 for construction, with dust control systems vented to stack S13.
- (g) One (1) enclosed dry mixer, identified as P015, with a storage capacity of 1350 gallons, a maximum throughput of 9960 tons per year, approved in 2013 for construction, with the

mixed material pneumatically conveyed into a storage hopper, vented to stack S08 and through a baghouse to stack S13.

- (h) One (1) enclosed heated (hot oil heater) liquid storage tank not containing any HAPs or VOCs, identified as P010, with a capacity of 18,000 gallons, a maximum throughput of 32,850 tons per year, approved in 2013 for construction. Emissions are vented through a wet scrubber and filter system to stack S08.
- (i) One (1) enclosed heated (from hot oil heater) and agitated mix tank, identified as P011, with a capacity of 2600 gallons, a maximum throughput of 19,710 tons per year, approved in 2013 for construction, with emissions vented through a wet scrubber and filter system to stack 09.
- (j) One (1) enclosed heated (from hot oil heater) process tank, identified as P021, with a capacity of 450 gallons, a maximum throughput of 19,710 tons per year, approved in 2013 for construction, with emissions vented through a wet scrubber and filter system to stack 09.
- (k) One (1) heated (from hot oil heater) and agitated Remelt tank, identified as P022, with a capacity of 1055 gallons, a maximum throughput of 8760 tons per year, approved in 2013 for construction, with wet scrubber and filter system as a control device, vented inside the building.
- (l) One (1) pneumatically operated water cooled molding process, identified as P017, approved in 2013 for construction, vented inside the building. There are no expected emissions from this process.
- (m) Two (2) paint spray booths, identified as P06a and P06b, constructed in 2005, each equipped with four (4) air atomized spray guns, with a maximum capacity of 158,352 units per day, using dry filters for particulate control and exhausting to stack S06;
- (n) Two (2) paint spray booths, identified as P07a and P07b, constructed in 2005, each equipped with four (4) air atomized spray guns, with a maximum capacity of 158,352 units per day, using dry filters for particulate control and exhausting to stack S07;
- (o) Two (2) paint spray booths, identified as P016a and P016b, approved in 2013 for construction, each equipped with eight (8) air atomized spray guns, with a combined maximum capacity of 158,352 units per day, using dry filters for particulate control and exhausting to stack S14.
- (p) Two (2) pitch storage tanks, identified as P01 and P02, exhausting to stacks S01 and S02, respectively;
- (q) Two (2) pitch mix tanks, identified as P05a and P05b, installed in 2005, each with a capacity of 30,000 gallons.
- (r) One (1) pitch re-melt tank, identified as P09, installed in 2005, with a capacity of 300 gallons.
- (s) Paved and unpaved roads.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M149-32378-00027, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

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

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

B.7 Duty to Provide Information

- (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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M149-32378-00027 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

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

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

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

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

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

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [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 2-6.1-5(a)(1)]

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
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.

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

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

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required

monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

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

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

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);
or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

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

- (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.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

- (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 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (m) Two (2) paint spray booths, identified as P06a and P06b, constructed in 2005, each equipped with four (4) air atomized spray guns, with a maximum capacity of 158,352 units per day, using dry filters for particulate control and exhausting to stack S06;
- (n) Two (2) paint spray booths, identified as P07a and P07b, constructed in 2005, each equipped with four (4) air atomized spray guns, with a maximum capacity of 158,352 units per day, using dry filters for particulate control and exhausting to stack S07;
- (o) Two (2) paint spray booths, identified as P016a and P016b, approved in 2013 for construction, each equipped with eight (8) air atomized spray guns, with a combined maximum capacity of 158,352 units per day, using dry filters for particulate control and exhausting to stack S14.

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

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

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:

- (a) The source shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.3 Particulate

In order to comply with Condition D.1.1, the dry particulate filter, waterwash, or an equivalent control device for particulate control shall be in operation at all times when the spray booths are in operation.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) Two (2) enclosed dry material #1 storage silos and conveyors, identified as P03 and P04, constructed in 2005, each with a storage capacity of 2475 cubic feet and each with a maximum throughput of 26500 tons per year, both using baghouses as particulate control, and exhausting to stacks S03, S04 and S05;
- (c) One (1) enclosed dry material #1 storage tank, identified as P012, with a storage capacity of 2475 cubic feet, a maximum throughput of 8760 tons per year, approved in 2013 for construction, with emissions vented through a pulse-jet cleaning dust collector to stack S10.
- (e) One (1) enclosed dry material #3 storage tank, identified as P014, with a storage capacity of 600 cubic feet, a maximum throughput of 9960 tons per year, approved in 2013 for construction, with emissions vented through a pulse-jet cleaning dust collector to stack S12.
- (g) One (1) enclosed dry mixer, identified as P015, with a storage capacity of 1350 gallons, a maximum throughput of 9960 tons per year, approved in 2013 for construction, with the mixed material pneumatically conveyed into a storage hopper, vented to stack S08 and through a baghouse to stack S13.
- (q) Two (2) pitch mix tanks, identified as P05a and P05b, installed in 2005, each with a capacity of 30,000 gallons.

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

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

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

- (a) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the dry material storage silos, identified as P03 and P04, shall each not exceed 8.61 pounds per hour when operating at a process weight rate of 3.03 tons per hour. The allowable particulate emission rate from the dry material #1 storage silo, identified as P012, shall each not exceed 4.10 pounds per hour when operating at a process weight rate of 1.00 ton per hour. The allowable particulate emission rate from the dry material #3 storage silo, identified as P014, shall each not exceed 4.47 pounds per hour when operating at a process weight rate of 1.14 tons per hour. The allowable particulate emission rate from the dry mixer, identified as P015, shall each not exceed 4.47 pounds per hour when operating at a process weight rate of 1.14 tons per hour.

In order to comply with these limits, the baghouses (P03, P04, and P15) and the dust collectors (P012 and P014) for particulate control shall be in operation and control emissions at all times that the dry material #1 and #3 storage silos and the dry mixer are in operation.

- (b) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the two (2) pitch mix tanks, identified as P05a and P05b, shall each not exceed 6.48 pounds per hour when operating at a process weight rate of 1.98 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:

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.2.3 Particulate Control

- (a) In order to comply with the requirements of Condition D.2.1, the baghouses (P03, P04, and P015) and the dust collectors (P012 and P014) for particulate control shall be in operation and control emissions from the dry material #1 and #3 storage silos and dry mixer, identified as P03, P04, P012, P014 and P015 at all times that the dry material storage silos and the dry mixer 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.

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

D.2.4 Visible Emission Notations

- (a) Daily visible emission notations of the dry material storage silos, identified as P03, P04, P012, P014, and the dry mixer, identified as P015, stack exhausts 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 reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.5 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the dry material storage silos, identified as P03 and P04, and the dry mixer, identified as P015 at least once daily when the dry material storage silos and the dry mixer are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

D.2.6 Broken or Failed Bag Detection

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 emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.2.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records of daily visible emission notations of the dry material storage silos, identified as P03, P04, P012 and P014, and the dry mixer, identified as P015, stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.2.4, the Permittee shall maintain daily records of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (c) Section C - General Record Keeping Requirements, contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	White Flyer Targets
Address:	317 Kloeckner Drive
City:	Knox, Indiana 46534
Phone #:	570-644-0453
MSOP #:	M149-28339-00027

I hereby certify that White Flyer Targets is :

still in operation.

no longer in operation.

I hereby certify that White Flyer Targets is :

in compliance with the requirements of MSOP M149-28339-00027.

not in compliance with the requirements of MSOP M149-28339-00027.

Authorized Individual (typed):
Title:
Signature:
Date:

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

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865**

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

Technical Support Document (TSD) for a Significant Permit Revision to a
Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name: White Flyer Targets
Source Location: 317 Kloeckner Drive, Knox, IN 46534
County: Starke
SIC Code: 3949 (Sporting and Athletic Goods, Not Elsewhere Classified)
Operation Permit No.: M149-28339-00027
Operation Permit Issuance Date: October 28, 2009
Significant Permit Revision No.: 149-32378-00027
Permit Reviewer: Susann Brown

On October 3, 2012, the Office of Air Quality (OAQ) received an application from White Flyer Targets related to a modification to an existing stationary sporting goods manufacturing plant.

Existing Approvals

The source was issued MSOP No. M149-28339-00027 on October 28, 2009. There have been no subsequent approvals.

County Attainment Status

The source is located in Starke County.

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

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Starke County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 Starke County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5}

emissions. 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_{2.5} significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore, direct PM_{2.5} and SO₂ 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
 Starke County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Status of the Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

This PTE table is from the TSD of MSOP M149-28339-00027, issued on October 28, 2009.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e*	Total HAPs	Worst Single HAP
Hot Oil Heater	0.02	0.08	0.08	0.01	1.10	0.06	0.92	1296	0.02	0.02(hexane)
Limestone Storage Silos and Conveyors	131.18	21.20	21.20	-	-	-	-	-	-	-
Mix and Storage Tanks	-	-	-	-	-	1.70E-04	-	-	-	-
Spray Booths	18.31	18.31	18.31	-	-	-	-	-	-	-
Total PTE of Entire Source	149.51	39.59	39.59	0.01	1.10	0.06	0.92	1296	0.02	0.02 (hexane)
Title V Major Source Thresholds*	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds*	250	250	250	250	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	100	100	100	100	100	100	100	NA	NA	NA

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e*	Total HAPs	Worst Single HAP
*The 100,000 CO ₂ e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3), because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application submitted by White Flyer Targets on October 3, 2012, relating to the addition of new emission units. This source manufactures clay targets for the sporting goods industry and is requesting to expand its capacity by adding additional emission units. Additional details were also added to the following existing emission units: storage and pitch tanks and the hot oil heater. The limestone storage silos and conveyors are now described as dry material #1 storage silos and conveyors.

The following is a list of the new emission units and pollution control devices:

- (a) One (1) enclosed dry material #1 storage tank, identified as P012, with a storage capacity of 2475 cubic feet, a maximum throughput of 8760 tons per year, approved in 2013 for construction, with emissions vented through a pulse-jet cleaning dust collector to stack S10.
- (b) One (1) enclosed dry material #2 storage tank, identified as P013, with a storage capacity of 1701 cubic feet, a maximum throughput of 958 tons per year, approved in 2013 for construction, with emissions vented through a pulse-jet cleaning dust collector to stack S11.
- (c) One (1) enclosed dry material #3 storage tank, identified as P014, with a storage capacity of 600 cubic feet, a maximum throughput of 9960 tons per year, approved in 2013 for construction, with emissions vented through a pulse-jet cleaning dust collector to stack S12.
- (d) Three (3) supersack and/or silo enclosed indoor dry material dump stations, identified as P018a, P018b, and P018c, approved in 2013 for construction, with dust control systems vented to stack S13.
- (e) One (1) enclosed dry mixer, identified as P015, with a storage capacity of 1350 gallons, a maximum throughput of 9960 tons per year, approved in 2013 for construction, with the mixed material pneumatically conveyed into a storage hopper, vented to stack S08 and through a baghouse to stack S13.
- (f) One (1) enclosed heated (hot oil heater) liquid storage tank not containing any HAPs or VOCs, identified as P010, with a capacity of 18,000 gallons, a maximum throughput of 32,850 tons per year, approved in 2013 for construction. Emissions are vented through a wet scrubber and filter system to stack S08.

- (g) One (1) enclosed heated (from hot oil heater) and agitated mix tank, identified as P011, with a capacity of 2600 gallons, a maximum throughput of 19,710 tons per year, approved in 2013 for construction, with emissions vented through a wet scrubber and filter system to stack 09.
- (h) One (1) enclosed heated (from hot oil heater) process tank, identified as P021, with a capacity of 450 gallons, a maximum throughput of 19,710 tons per year, approved in 2013 for construction, with emissions vented through a wet scrubber and filter system to stack 09.
- (i) One (1) heated (from hot oil heater) and agitated Remelt tank, identified as P022, with a capacity of 1055 gallons, a maximum throughput of 8760 tons per year, approved in 2013 for construction, with wet scrubber and filter system as a control device, vented inside the building.
- (j) One (1) pneumatically operated water cooled molding process, identified as P017, approved in 2013 for construction, vented inside the building. There are no expected emissions from this process.
- (k) Two (2) paint spray booths, identified as P016a and P016b, approved in 2013 for construction, each equipped with eight (8) air atomized spray guns, with a combined maximum capacity of 158,352 units per day, using dry filters for particulate control and exhausting to stack S14.
- (l) Paved and unpaved roads.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)									
	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Material Storage	48.70	7.87	(10.30)	0.23	-	-	-	-	-	-
Mixing and Process	52.51	31.84	29.35	-	-	-	-	-	-	-
Pitch Tanks	-	-	-	-	-	(4.5E-05)	-	-	-	-
Spray Booths	(3.77)	(3.77)	(3.77)	-	-	1.64	-	-	-	-
Paved and unpaved roads	1.32	0.32	0.04	-	-	-	-	-	-	-
Total PTE of Proposed Revision	98.75	36.26	15.32	0.23	-	1.64	-	-	-	-

Pursuant to 326 IAC 2-6.1-6(i)(1)(E), this MSOP is revised through a Significant Permit Revision because the proposed revision involves the construction of new emission units with a potential to emit greater than or equal to twenty-five (25) tons per year of PM and PM10.

PTE of the Entire Source After Issuance of the MSOP Revision

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strike through~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Hot Oil Heater	0.02	0.08	0.08	0.01	1.10 1.07	0.06	0.92 0.90	1296	0.02	0.02 (hexane)
Material Storage	131.18 179.88	21.20 29.07	21.20 10.90	0.23	-	-	-	-	-	-
Mixing and Process	52.51	31.84	29.35	-	-	-	-	-	-	-
Pitch Tanks	-	-	-	-	-	1.70E-04 1.25E-04	-	-	-	-
Spray Booths	18.31 14.54	18.31 14.54	18.31 14.54	-	-	1.64	-	-	-	-
Paved Roads	0.28	0.06	0.01	-	-	-	-	-	-	-
Unpaved Roads	1.04	0.26	0.03	-	-	-	-	-	-	-
Total Fugitive Emissions***	1.32	0.32	0.04	-	-	-	-	-	-	-
Total PTE of Entire Source	248.26	75.85	54.91	0.24	1.07	1.70	0.90	1296	0.02	hexane
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
<p>* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".</p> <p>** The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.</p> <p>*** Fugitive emissions are counted toward the determination of PSD and Part 70 Permit applicability.</p> <p>Note: Material Storage PM2.5 emissions decreased because PM2.5 emission factors were available for the calculations (assumed PM2.5=PM10 during previous calculations). The pitch tank emissions decreased due to revised calculation methodology. Spray booth net emissions decreased because the contents of the material used changed, which reduced emissions (two additional spray booths added to the facility with this revision).</p>										

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this MSOP permit revision, 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 Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Hot Oil Heater	0.02	0.08	0.08	0.01	1.07	0.06	0.90	1296	0.02	0.02 (hexane)
Material Storage	179.88	29.07	10.90	0.23	-	-	-	-	-	-
Mixing and Process	52.51	31.84	29.35	-	-	-	-	-	-	-
Pitch Tanks	-	-	-	-	-	1.25E-04	-	-	-	-
Spray Booths	14.54	14.54	14.54	-	-	1.64	-	-	-	-
Paved Roads	0.28	0.06	0.01	-	-	-	-	-	-	-
Unpaved Roads	1.04	0.26	0.03	-	-	-	-	-	-	-
Total Fugitive Emissions	1.32	0.32	0.04	-	-	-	-	-	-	-
Total PTE of Entire Source	248.26	75.85	54.91	0.24	1.07	1.70	0.90	1296	0.02	hexane
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
<p>* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".</p> <p>** The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.</p> <p>*** Fugitive emissions are counted toward the determination of PSD and Part 70 Permit applicability.</p>										

MSOP Status

- (a) This revision to an existing minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source is still less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).
- (b) This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit greenhouse gases (GHGs) will still be less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent (CO₂e) emissions per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) There are no new New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Brick and Structural Clay Products Manufacturing, 40 CFR 63, Subpart JJJJJ (326 IAC 20-72) are not included in this permit because this rule only applies to brick and structural clay products manufacturing facilities that are located at, or are part of, a major source of HAP emissions. This source is not a brick and structural clay products manufacturing facility and is not a major source of HAP emissions.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Clay Ceramics Manufacturing, 40 CFR 63, Subpart KKKKK (326 IAC 20-73) are not included in this permit because this rule only applies to clay ceramics manufacturing facilities that are located at, or are part of, a major source of HAP emissions. This source is not a clay ceramics manufacturing facility and is not a major source of HAP emissions.
- (d) There are no new National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

- (e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

Paint Spray Booths

- (g) 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)
Pursuant to 326 IAC 6-3-2(d), the surface coating processes P016a and P016b shall be controlled by a dry particulate filter, water wash, or an equivalent control device, subject to the following:
- (a) The source shall operate the control device in accordance with manufacturer's specifications.
 - (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records shall be maintained for five (5) years.
- (h) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
Each of the paint spray booths, identified as P016a and P016b are not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each booth is less than twenty-five (25) tons per year.
- (i) There are no other 326 IAC 8 Rules that are applicable to the paint spray booths.

Material Storage

- (j) 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)
Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the dry material #1 storage silo, identified as P012, shall each not exceed 4.10 pounds per hour when operating at a process weight rate of 1.00 ton per hour.

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

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

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

In order to comply with this limit, the dust collector (P012) for particulate control shall be in operation and control emissions at all times that the dry material #1 storage silo is in operation.

- (k) 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)
Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the dry material #3 storage silo, identified as P014, shall each not exceed 4.47 pounds per hour when operating at a process weight rate of 1.14 tons per hour.

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

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

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

In order to comply with this limit, the dust collector (P014) for particulate control shall be in operation and control emissions at all times that the dry material #3 storage silo is in operation.

Mixing and Process

- (l) 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)
Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the dry mixer, identified as P015, shall each not exceed 4.47 pounds per hour when operating at a process weight rate of 1.14 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:

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

In order to comply with this limit, the baghouse (P015) for particulate control shall be in operation and control emissions at all times that the dry mixer is in operation.

Compliance Determination, Monitoring and Testing Requirements
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The compliance determination and monitoring requirements applicable to this source are as follows:

- (a) The Dry Mixer, identified as P015 has applicable compliance monitoring conditions as specified below:
 - (1) Visible Emission Notations
 - (A) Daily visible emission notations of the Dry Mixer, identified as P015, stack exhausts 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 reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
 - (2) The Permittee shall record the pressure drop across the baghouses at least once daily when the storage silos and the dry mixer are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
 - (3) In the event that bag failure has been observed:
 - (A) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps shall be initiated. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 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 single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

Proposed Changes

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

...
A.2 Emission Units and Pollution Control Equipment Summary

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

- ~~(f)~~ (a) One (1) hot oil heater, **identified as P08, constructed in 2005**, rated at 2.5 MMBtu per hour; ~~and~~
- ~~(e)~~ (b) Two (2) ~~limestone storage silos and conveyors~~ **enclosed dry material #1 storage silos and conveyors**, identified as P03 and P04, **constructed in 2005, each with a storage capacity of 2475 cubic feet and each with a maximum throughput of 26500 tons per year, both** using ~~CE-Flex-Kleen~~ baghouses as particulate control, and exhausting to stacks S03, S04 and S05;
- (c) **One (1) enclosed dry material #1 storage tank, identified as P012, with a storage capacity of 2475 cubic feet, a maximum throughput of 8760 tons per year, approved in 2013 for construction, with emissions vented through a pulse-jet cleaning dust collector to stack S10.**
- (d) **One (1) enclosed dry material #2 storage tank, identified as P013, with a storage capacity of 1701 cubic feet, a maximum throughput of 958 tons per year, approved in 2013 for construction, with emissions vented through a pulse-jet cleaning dust collector to stack S11.**
- (e) **One (1) enclosed dry material #3 storage tank, identified as P014, with a storage capacity of 600 cubic feet, a maximum throughput of 9960 tons per year, approved in 2013 for construction, with emissions vented through a pulse-jet cleaning dust collector to stack S12.**
- (f) **Three (3) supersack and/or silo enclosed indoor dry material dump stations, identified as P018a, P018b, and P018c, approved in 2013 for construction, with dust control systems vented to stacks S13.**
- (g) **One (1) enclosed dry mixer, identified as P015, with a storage capacity of 1350 gallons, a maximum throughput of 9960 tons per year, approved in 2013 for**

construction, with the mixed material pneumatically conveyed into a storage hopper, vented to stack S08 and through a baghouse to stack S13.

- (h) One (1) enclosed heated (hot oil heater) liquid storage tank not containing any HAPs or VOCs, identified as P010, with a capacity of 18,000 gallons, a maximum throughput of 32,850 tons per year, approved in 2013 for construction. Emissions are vented through a wet scrubber and filter system to stack S08.**
- (i) One (1) enclosed heated (from hot oil heater) and agitated mix tank, identified as P011, with a capacity of 2600 gallons, a maximum throughput of 19,710 tons per year, approved in 2013 for construction, with emissions vented through a wet scrubber and filter system to stack 09.**
- (j) One (1) enclosed heated (from hot oil heater) process tank, identified as P021, with a capacity of 450 gallons, a maximum throughput of 19,710 tons per year, approved in 2013 for construction, with emissions vented through a wet scrubber and filter system to stack 09.**
- (k) One (1) heated (from hot oil heater) and agitated Remelt tank, identified as P022, with a capacity of 1055 gallons, a maximum throughput of 8760 tons per year, approved in 2013 for construction, with wet scrubber and filter system as a control device, vented inside the building.**
- (l) One (1) pneumatically operated water cooled molding process, identified as P017, approved in 2013 for construction, vented inside the building. There are no expected emissions from this process.**
- ~~(a)~~ **(m) Two (2) paint spray booths, identified as P06a and P06b, constructed in 2005, each equipped with four (4) air atomized spray guns, for the coating of clay targets, with a maximum capacity of 460,000 **158,352** units per day, using dry filters for particulate control and exhausting to stack S06;**
- ~~(b)~~ **(n) Two (2) paint spray booths, identified as P07a and P07b, constructed in 2005, each equipped with four (4) air atomized spray guns, for the coating of clay targets, with a maximum capacity of 460,000 **158,352** units per day, using dry filters for particulate control and exhausting to stack S07;**
- (o) Two (2) paint spray booths, identified as P016a and P016b, approved in 2013 for construction, each equipped with eight (8) air atomized spray guns, with a combined maximum capacity of 158,352 units per day, using dry filters for particulate control and exhausting to stack S14.**
- ~~(d)~~ **(p) Two (2) pitch storage tanks, identified as P01 and P02, exhausting to stacks S01 and S02, respectively;**
- ~~(e)~~ **(q) Two ~~pitch~~ (2) mix tanks, identified as P05a and P05b, installed in 2005, each with a capacity of 30,000 gallons.**
- ~~(g)~~ **(r) One (1) ~~pitch~~ re-melt tank, identified as P09, installed in 2005, with a capacity of 300 gallons.**
- (s) Paved and unpaved roads.**

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (m) Two (2) paint spray booths, identified as P06a and P06b, constructed in 2005, each equipped with four (4) air atomized spray guns, with a maximum capacity of ~~460,000~~ **158,352** units per day, using dry filters for particulate control and exhausting to stack S06;
- (n) Two (2) paint spray booths, identified as P07a and P07b, constructed in 2005, each equipped with four (4) air atomized spray guns, with a maximum capacity of ~~460,000~~ **158,352** units per day, using dry filters for particulate control and exhausting to stack S07;
- (o) **Two (2) paint spray booths, identified as P016a and P016b, approved in 2013 for construction, each equipped with eight (8) air atomized spray guns, with a combined maximum capacity of 158,352 units per day, using dry filters for particulate control and exhausting to stack S14.**

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

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

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:

- (a) The source shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

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

~~D.1.3 Monitoring~~

- ~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the two (2) paint booth stacks (S06 and S07) while one or more of the booths are in operation. If a condition exists which should result in a response stop, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard~~

~~to the reasonable response steps required by this condition. Failure to take response steps 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 rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.~~

Compliance Determination Requirements

D.1.3 Particulate

In order to comply with Condition D.1.1, the dry particulate filter, waterwash, or an equivalent control device for particulate control shall be in operation at all times when the spray booths are in operation.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain a log of weekly overspray observations, **and** daily and monthly inspections.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- ~~(e)~~ **(b)** Two (2) ~~limestone storage silos and conveyors~~ **enclosed dry material #1 storage silos and conveyors**, identified as P03 and P04, **constructed in 2005, each with a storage capacity of 2475 cubic feet and each with a maximum throughput of 26500 tons per year, both** using ~~CE-Flex-Kleen~~ baghouses as particulate control, and exhausting to stacks S03, S04 and S05;
- (c)** One (1) enclosed dry material #1 storage tank, identified as P012, with a storage capacity of 2475 cubic feet, a maximum throughput of 8760 tons per year, approved in 2013 for construction, with emissions vented through a pulse-jet cleaning dust collector to stack S10.
- (e)** One (1) enclosed dry material #3 storage tank, identified as P014, with a storage capacity of 600 cubic feet, a maximum throughput of 9960 tons per year, approved in 2013 for construction, with emissions vented through a pulse-jet cleaning dust collector to stack S12.
- (g)** One (1) enclosed dry mixer, identified as P015, with a storage capacity of 1350 gallons, a maximum throughput of 9960 tons per year, approved in 2013 for construction, with the mixed material pneumatically conveyed into a storage hopper, vented to stack S08 and through a baghouse to stack S13.
- ~~(e)~~ **(q)** Two ~~pitch~~ **(2) mix tanks**, identified as P05a and P05b, **installed in 2005, each with a**

capacity of 30,000 gallons.

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

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

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

- (a) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the ~~limestone~~ **dry material** storage silos, identified as P03 and P04, shall each not exceed 8.61 pounds per hour when operating at a process weight rate of 3.03 tons per hour. **The allowable particulate emission rate from the dry material #1 storage silo, identified as P012, shall each not exceed 4.10 pounds per hour when operating at a process weight rate of 1.00 tons per hour. The allowable particulate emission rate from the dry material #3 storage silo, identified as P014, shall each not exceed 4.47 pounds per hour when operating at a process weight rate of 1.14 tons per hour. The allowable particulate emission rate from the dry mixer, identified as P015, shall each not exceed 4.47 pounds per hour when operating at a process weight rate of 1.14 tons per hour.**

In order to comply with ~~this~~ **these** limits, the baghouses (**P03, P04, and P15**) and the **dust collectors (P012 and P014)** for particulate control shall be in operation and control emissions at all times that the ~~limestone dry material~~ **dry material #1 and #3 storage silos and the dry mixer** are in operation.

- (b) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the two (2) **pitch** mix tanks, identified as P05a and P05b, shall each not exceed 6.48 pounds per hour when operating at a process weight rate of 1.98 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:

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

D.2.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.2.3 Particulate Control

- (a) In order to comply with the requirements of Condition D.2.1, the baghouses **(P03, P04, and P15) and the dust collectors (P012 and P014)** for particulate control shall be in operation and control emissions from the ~~limestone dry material #1 and #3~~ **limestone dry material #1 and #3 storage silos and dry mixer, identified as P03, and P04, P012, P014 and P015** at all times that the ~~limestone dry material #1 and #3 storage silos and the dry mixer~~ 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.

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

D.2.4 Visible Emission Notations

- (a) Daily visible emission notations of the ~~two (2) limestone dry material~~ **limestone dry material** storage silos, identified as P03, and P04, **P012, P014, and the dry mixer, identified as P015**, stack exhausts 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 reasonable response steps. ~~in accordance with Section C - Response to Excursions or Exceedances. Failure to take~~ **contains the Permittee's obligation with regard to the reasonable response steps in accordance with Section C - Response to Excursions or Exceedances required by this condition. Failure to take response steps shall be considered a deviation from this permit.**

D.2.5 Parametric Monitoring

The Permittee shall record the ~~total static~~ pressure drop across the baghouses used in conjunction with the ~~two (2) limestone dry material~~ **limestone dry material** storage silos, identified as P03 and P04, and the dry mixer, identified as P015 at least once daily when the ~~two (2) limestone dry material~~ storage silos and the dry mixer are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. ~~in accordance with Section C - Response to Excursions or Exceedances.~~ A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps ~~in accordance with Section C - Response to Excursions or Exceedances~~ shall be considered a deviation from this permit.

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

D.2.6 Broken or Failed Bag Detection

~~In the event that bag failure has been observed:~~

- (A) ~~For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in Section C - Response to Excursions or Exceedances shall be initiated. For any failure with corresponding response steps and timetable not described in Section C - Response to Excursions or Exceedances, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 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 baghouses, **controlling emissions from a batch process**, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, **the feed to the process failed units and the associated process will shall** be shut down immediately until the failed units **have has** been repaired or replaced. **The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit.** Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

D.2.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records of daily visible emission notations of the ~~two (2) limestone dry material storage silos, identified as P03 and, P04,~~ **P012 and P014, and the dry mixer, identified as P015**, stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.2.4, the Permittee shall maintain daily records of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

- (c) ~~All records should be maintained in accordance with Section C - General Record Keeping Requirements, of this permit~~ **contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.**

...

- (b) IDEM, OAQ has made additional revisions to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

- (1) Section A.1 of the permit and the reporting forms have been revised to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.
- (2) IDEM has revised the emission unit descriptions in Sections A.2 and D.1.
- (3) For clarity, IDEM has changed references to the general conditions: "in accordance with Section B", in accordance with Section C", or other similar language to "Section C...contains the Permittee's obligations with regard to the records required by this condition."
- (4) IDEM 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 timelines have been switched to "no later than" or "not later than" except when the underlying rule states "within."
- (5) IDEM has determined that rather than having a certification condition and various references throughout the permit as to whether a particular report, notice, or correspondence needs to include a certification, the specific conditions that require an affirmation of truth and completeness shall state so. The certification condition has been removed. All statements to whether a certification, pursuant to the former Section B - Certification, is needed or not have been removed. Section B - Credible Evidence and Section C - Asbestos Abatement Projects still require certification as the underlying rules also require certifications.
- (6) IDEM has clarified the requirements of Section B – Preventive Maintenance Plan and to add a new paragraph (b) to handle a future situation where the Permittee adds units that need preventive maintenance plans. IDEM, OAQ has decided to clarify other aspects of Section B - Preventive Maintenance Plan
- (7) IDEM has revised Section B - Permit Renewal paragraph (c) to state which rule establishes the authority to set a deadline for the Permittee to submit additional information.
- (8) IDEM has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.
- (9) IDEM has revised Section C - Incineration to more closely reflect the two underlying rules.
- (10) IDEM has removed the first paragraph of Section C - Performance Testing because the specific testing conditions elsewhere in the permit will specify the timeline and procedures.
- (11) IDEM has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.

- (12) IDEM 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.
- (13) IDEM 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 switched 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.
- (14) 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.

Mailing Address: ~~317 Kloeckner Avenue, Knox, IN 46534~~

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SECTION B ~~GENERAL CONDITIONS~~

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

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

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

- ~~(a) This permit, M149-28339-00027, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.~~
- ~~(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.~~

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

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

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

B.4 ~~Enforceability~~

~~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~~

~~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~~

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

B.7 ~~Duty to Provide Information~~

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

B.8 — Certification

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

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

- (a) ~~An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.~~
- (b) ~~The annual notice shall be submitted in the format attached no later than March 1 of each year to:~~

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251
- (c) ~~The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~

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

- (a) ~~If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within 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 46204-2254

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) ~~A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- (c) ~~To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.~~

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

- (a) ~~All terms and conditions of permits established prior to M149-28339-00027 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) ~~incorporated as originally stated,~~
 - (2) ~~revised, or~~
 - (3) ~~deleted.~~~~
- (b) ~~All previous registrations and permits are superseded by this permit.~~

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

~~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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.~~

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

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

~~Request for renewal shall be submitted to:~~

~~Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

~~(b) — A timely renewal application is one that is:~~

~~(1) — Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and~~

~~(2) — If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~

~~(c) — If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.~~

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

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

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

~~Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254~~

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

~~(c) — The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]~~

~~B.15 — Source Modification Requirement~~

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

~~B.16 — Inspection and Entry~~

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

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

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

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

- (c) ~~As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;~~
- (d) ~~As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and~~
- (e) ~~As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.~~

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

- (a) ~~The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.~~
- (b) ~~Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:~~

~~Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251~~

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

- (c) ~~The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]~~

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

~~(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 by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(e) Procedures for Asbestos Emission Control~~

~~The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~

- (f) ~~Demolition and Renovation~~
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) ~~Indiana Licensed Asbestos Inspector~~
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

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

~~no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- (b) ~~The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- (c) ~~Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.~~

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

~~Corrective Actions and Response Steps~~

~~C.13 Response to Excursions or Exceedances~~

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

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

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

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

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

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

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

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

- ~~(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.~~
- ~~(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.~~
- ~~(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).~~
- ~~(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]~~

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

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

~~C.17 — General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]~~

- ~~(a) — Reports required by conditions in Section D of this permit shall be submitted to:~~

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

- ~~(b) — Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.~~
- ~~(c) — Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(d) — The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.~~

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M149-32378-00027, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

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

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

B.7 Duty to Provide Information

- (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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

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

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The Permittee shall implement the PMPs.

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M149-32378-00027 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (4) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

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

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003

Indianapolis, Indiana 46204-2251

(c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

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

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

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

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

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

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of

permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

**Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251**

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]**

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.**
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.**

B.18 Credible Evidence [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 2-6.1-5(a)(1)]

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

except as provided in 326 IAC 9-1-2 or in this permit.

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

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

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
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.

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

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

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Compliance with applicable requirements shall be documented as required by this permit.

The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

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

- (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.
- (c) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

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

- (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.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

- (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 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

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

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on October 3, 2012.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Significant Permit Revision No. 149-32378-00027. The staff recommends to the Commissioner that this MSOP Significant Permit Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Susann Brown at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5176 or toll free at 1-800-451-6027 extension 4-5176.
- (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.in.gov/idem

**TSD Appendix A: Emission Calculations
Revision Emissions**

Company Name: White Flyer Targets
Address City IN Zip: 317 Kloeckner Drive, Knox, IN 46534
Permit Number: 149-32378-00027
Reviewer: Susann Brown
Date: November 15, 2012

Unlimited Potential to Emit (PTE) (tons/year) (Before Controls)										
Emission Units	PM	PM10	PM2.5*	SOx	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP
Material Storage	48.70	7.87	-10.30	0.23	-	-	-	-	-	-
Mixing and Process	52.51	31.84	29.35	-	-	-	-	-	-	-
Spray Booths**	-3.77	-3.77	-3.77	-	-	1.64	-	-	-	-
Paved Roads	0.28	0.06	0.01	-	-	-	-	-	-	-
Unpaved Roads	1.04	0.26	0.03	-	-	-	-	-	-	-
Total PTE for Existing Units	98.75	36.26	15.32	0.23	-	1.64	-	-	-	-

Unlimited Potential to Emit (PTE) (tons/year) (After Controls)										
Emission Units	PM	PM10	PM2.5	SOx	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP
Material Storage	0.10	0.02	-0.02	6.90E-04	-	-	-	-	-	-
Mixing and Process	0.13	0.09	0.09	-	-	-	-	-	-	-
Spray Booths**	-0.01	0.03	0.03	-	-	1.64	-	-	-	-
Paved Roads	0.25	0.05	0.01	-	-	-	-	-	-	-
Unpaved Roads	0.68	0.17	0.02	-	-	-	-	-	-	-
Total PTE for Existing Units	1.16	0.36	0.13	6.90E-04	-	1.64	-	-	-	-

Note:
The Mixing and Process Emission Unit and Paved and Unpaved Roads Emission Units were added for this revision.
*PM2.5 has decreased because PM2.5 was assumed to be equal to PM10 for the previous permit calculations
**The Spray Booth PM/PM10/PM2.5 emissions have decreased because the source is now using paint with lower particulate matter properties (this revision will add two additional spray booths to this facility)

**TSD Appendix A: Emission Calculations
Emissions Summary**

Company Name: White Flyer Targets
Address City IN Zip: 317 Kloeckner Drive, Knox, IN 46534
Permit Number: 149-32378-00027
Reviewer: Susann Brown
Date: November 15, 2012

Unlimited Potential to Emit (PTE) (tons/year)										
(Before Controls)										
Emission Units	PM	PM10	PM2.5	SOx	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP
Hot Oil Heater	0.02	0.08	0.08	0.01	1.07	0.06	0.90	1,296	0.02	0.02 hexane
Material Storage	179.88	29.07	10.90	0.23	-	-	-	-	-	-
Mixing and Process	52.51	31.84	29.35	-	-	-	-	-	-	-
Pitch Tanks	-	-	-	-	-	1.25E-04	-	-	-	-
Spray Booths	14.54	14.54	14.54	-	-	1.64	-	-	-	-
Paved Roads	0.28	0.06	0.01	-	-	-	-	-	-	-
Unpaved Roads	1.04	0.26	0.03	-	-	-	-	-	-	-
Total PTE for Existing Units	248.26	75.85	54.91	0.24	1.07	1.70	0.90	1296	0.02	0.02 hexane

Unlimited Potential to Emit (PTE) (tons/year)										
(After Controls)										
Emission Units	PM	PM10	PM2.5	SOx	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP
Hot Oil Heater	0.02	0.08	0.08	0.01	1.07	0.06	0.90	1,296	2.03E-02	0.02 hexane
Material Storage	0.36	0.06	0.02	6.90E-04	-	-	-	-	-	-
Mixing and Process	0.13	0.09	0.09	-	-	-	-	-	-	-
Pitch Tanks	-	-	-	-	-	1.25E-04	-	-	-	-
Spray Booths	0.03	0.03	0.03	-	-	1.64	-	-	-	-
Paved Roads	0.25	0.05	0.01	-	-	-	-	-	-	-
Unpaved Roads	0.68	0.17	0.02	-	-	-	-	-	-	-
Total PTE for Existing Units	1.48	0.48	0.25	0.01	1.07	1.70	0.90	1296	2.03E-02	0.02 hexane

**TSD Appendix A: Emission Calculations
Natural Gas Combustion Only
Capacity <100 MMBtu/hr
Unlimited PTE for Existing Significant Boilers**

Company Name: White Flyer Targets
Source Address: 317 Kloeckner Ave., Knox, IN 46534
Permit Number: 149-28339-00027
Reviewer: Susann Brown
Date: November 15, 2012

Unit	Maximum Heat Input Capacity (MMBtu/hr)	High Heat Value (MMBtu/MMscf)	Potential Throughput (MMcf/yr)
Hot Oil Heater	2.50	1020	21.47
Totals	2.50		21.47

Criteria Pollutants	Pollutant					
	PM*	PM10/PM2.5*	SO2	NOx	VOC	CO
Uncontrolled Emission Factor in lb/MMcf	1.9	7.6	0.6	100 **see below	5.5	84
Uncontrolled Potential Emission in tons/yr	0.02	0.08	0.01	1.07	0.06	0.9
Control Efficiency (filterable only)	85.00%	85.00%				
Controlled Emission Factor in lb/MMcf	0.29	5.99				
Potential Emissions (after control) in tons/yr	0.00	0.06				

*PM emission factor is filterable PM only. PM10/PM2.5 emission factor is filterable and condensable PM10 combined.

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

Hazardous Air Pollutants	HAPs - Organics*					HAPs - Metals*				
	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.80	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.25E-05	1.29E-05	8.05E-04	0.02	3.65E-05	5.37E-06	1.18E-05	1.50E-05	4.08E-06	2.25E-05

*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

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMcf/yr) = [Heat Input Capacity (MMBtu/hr)] * [8,760 hours/year] * [MMcf/1,020 MMBtu]

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

Potential Emission of Total HAPs (tons/yr)	0.02
---	-------------

Greenhouse Gases (GHGs)

	Greenhouse Gas (GHG)		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120000	2.3	2.2
Potential Emission in tons/yr	1,288	0.02	0.02
Summed Potential Emissions in tons/yr	1,288		
CO2e Total in tons/yr	1,296		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 SO2 = Sulfur Dioxide
 NOx = Nitrous Oxides
 VOC - Volatile Organic Compounds
 CO = Carbon Monoxide

DCB = Dichlorobenzene
 Pb = Lead
 Cd = Cadmium
 Cr = Chromium
 Mn = Manganese
 Ni = Nickel

CO2 = Carbon Dioxide
 CH4 = Methane
 N2O = Nitrous Oxide
 CO2e = CO2 equivalent emissions

**Appendix A: Emission Calculations
Material Storage Emissions**

Company Name: White Flyer Targets
Address City IN Zip: 317 Kloeckner Drive, Knox, IN 46534
Permit Number: 149-32378-00027
Reviewer: Susann Brown
Date: November 15, 2012

Emission Unit	Maximum Throughput (tons/yr)	Pollutant*	Ef (lb/ton)	Uncontrolled Emissions (ton/yr)	Type of control	Control Efficiency (%)	Controlled Emissions (ton/yr)
Dry Material #1 - P03	26500	PM	4.95	65.59	Fabric Filter	99.80%	0.13
		PM10	0.80	10.60	Fabric Filter	99.80%	0.02
		PM2.5	0.30	3.98	Fabric Filter	99.80%	0.01
Dry Material #1 - P04	26500	PM	4.95	65.59	Fabric Filter	99.80%	0.13
		PM10	0.80	10.60	Fabric Filter	99.80%	0.02
		PM2.5	0.30	3.98	Fabric Filter	99.80%	0.01
Dry Material #1 - P012	8760	PM	4.95	21.68	Fabric Filter	99.80%	0.04
		PM10	0.80	3.50	Fabric Filter	99.80%	0.01
		PM2.5	0.30	1.31	Fabric Filter	99.80%	2.63E-03
Dry Material #2 - P013	958	PM	4.95	2.37	Fabric Filter	99.80%	4.74E-03
		PM10	0.80	0.38	Fabric Filter	99.80%	7.66E-04
		PM2.5	0.30	0.14	Fabric Filter	99.80%	2.87E-04
Dry Material #3 - P014	9960	PM	4.95	24.65	Fabric Filter	99.80%	4.93E-02
		PM10	0.80	3.98	Fabric Filter	99.80%	7.97E-03
		PM2.5	0.30	1.49	Fabric Filter	99.80%	2.99E-03
Heated liquid storage tank P010	32850	Hydrogen sulfide	1.40E-02	0.23	wet scrubber and filter	99.70%	6.90E-04

*Assume PM=PM10=PM2.5

Methodology

All storage and conveying is conducted in covered silos and covered conveyors.

These emissions include any emissions that would result from the molding process.

P03 and P04 maximum throughput has remained unchanged from the previous permit.

The controlled emission factors are from AP-42 Ch. 11.19.2-4 (8/04)

The uncontrolled total particulate matter emission factor was calculated from the controlled total particulate matter using the following equation:

Uncontrolled emission factor = Controlled total particulate emission factor (100% - Efficiency %)/ 100%

The conservative emission factor for the heated liquid storage tank assumes all hydrogen sulfide is released from sulfur upon its solidification.

**Appendix A: Emission Calculations
Mixing and Process Emissions**

Company Name: White Flyer Targets
Address City IN Zip: 317 Kloeckner Drive, Knox, IN 46534
Permit Number: 149-32378-00027
Reviewer: Susann Brown
Date: November 15, 2012

Emission Unit	Maximum Throughput (tons/yr)	Pollutant*	Ef (lb/ton)	Uncontrolled Emissions (ton/yr)	Type of control	Control Efficiency (%)	Controlled Emissions (ton/yr)
Dry Mixer- P015	9960	PM	4.95	24.65	Fabric Filter	99.80%	4.93E-02
		PM10	0.80	3.98	Fabric Filter	99.80%	7.97E-03
		PM2.5	0.30	1.49	Fabric Filter	99.80%	2.99E-03

*Assume PM=PM10=PM2.5

The controlled emission factors are from AP-42 Ch. 11.19.2-4 (8/04)

All dry storage and conveying is conducted in covered silos and covered conveyors.

The uncontrolled total particulate matter emission factor was calculated from the controlled total particulate matter using the following equation:

Uncontrolled emission factor = Controlled total particulate emission factor (100% - PM10 Efficiency %)/ 100%

Emission Unit Description	Flowrate (acfm) (a)	Estimated Grain Loading (b) (gr/dscf)	Controlled Potential Emissions PM/PM10/PM2.5 (lbs/hr)	Controlled Potential Emissions PM/PM10/PM2.5 (ton/yr)	Control Device % Efficiency	Uncontrolled Emissions PM/PM10/PM2.5 (lbs/hr)	Uncontrolled Emissions PM/PM10/PM2.5 (ton/yr)
Heated liquid storage tank P010	106	0.003	0.003	0.01	99.70%	0.91	3.98
Heated and agitated mix tank P011	106	0.003	0.003	0.01	99.70%	0.91	3.98
Heated process tank P021	106	0.003	0.003	0.01	99.70%	0.91	3.98
Remelt tank P022	106	0.003	0.003	0.01	99.70%	0.91	3.98
Super sack and/or silo dry material dump station P018a	106	0.003	0.003	0.01	99.70%	0.91	3.98
Super sack and/or silo dry material dump station P018b	106	0.003	0.003	0.01	99.70%	0.91	3.98
Super sack and/or silo dry material dump station P018c	106	0.003	0.003	0.01	99.70%	0.91	3.98
Totals			0.02	0.08		6.36	27.86

Notes:

a) Values are total airflows for all of the baghouses at an emission source.

b) Grain loading values in the baghouse exhaust, based on manufacturer's data.

c) Assumed that the air exhausted through the stacks is equal to the volume of dry material loaded. Grain loading values are conservative estimates based on engineering judgement.

Methodology:

Controlled Potential Emissions (lbs/hr) = [Grain Loading (gr/dscf)] x [Air Flow (dscfm)] x [60 min/hr] x [lb/7000 grains]

Controlled Potential Emissions (tons/yr) = [Controlled Potential Emissions (lbs/hr)] x [8760 hrs/yr] x [ton/2000 lb]

Uncontrolled Potential Emissions (lbs/hr) = [Controlled Potential Emissions (lbs/hr)] x [1 / 1 - Control Efficiency (%)]

Uncontrolled Potential Emissions (tons/yr) = [Uncontrolled Potential Emissions (lbs/hr)] x [8760 hrs/yr] x [ton/2000 lb]

**Appendix A: Emission Calculations
Petroleum Pitch Tank Emissions**

Company Name: White Flyer Targets
Address City IN Zip: 317 Kloeckner Drive, Knox, IN 46534
Permit Number: 149-32378-00027
Reviewer: Susann Brown
Date: November 15, 2012

Tank VOC Emissions - Maximum PTE

Tank ID	Product Stored	Throughput (gallons/yr)	Tank Height (ft)	Diameter (ft)	Vapor Molecular Weight	Vapor Space Outage (ft)	Material Vapor Pressure (psia)	Turnovers per Year	Tank Capacity (gallons)	Breathing Loss (lbs)	Turnover Factor	Working Loss (lbs)	Total VOC Tons/yr
P01	Petroleum Pitch	555,000.00	30	14.5	470	1.10	1.25E-05	15	37,000	0.01	1	0.08	4.50E-05
P02	Petroleum Pitch	555,000.00	30	14.5	470	1.10	1.25E-05	15	37,000	0.01	1	0.08	4.50E-05
P05a	Petroleum Pitch	1,111,000.00	8	6.5	470	1.10	1.25E-05	700	2,000	0.00	1	0.03	1.50E-05
P05b	Petroleum Pitch	1,111,000.00	8	6.5	470	1.10	1.25E-05	700	2,000	0.00	1	0.03	1.50E-05
P09	Petroleum Pitch	125,000.00	5.8	4	470	1.10	1.25E-05	1750	550	0.00	1	0.01	5.00E-06
													1.25E-04

Note: Storage tank emissions estimated using EPA software Tanks 4.09

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Emission Units P06a, P06b, P07a, P07b, P016a and P016b**

Company Name: White Flyer Targets
Address City IN Zip: 317 Kloeckner Drive, Knox, IN 46534
Permit Number: 149-32378-00027
Reviewer: Susann Brown
Date: November 15, 2012

Booth	Units/day	Units/hour
P06a & P06b	158352	6598
P07a & P07b	158352	6598
P016a & P016b	158352	6598

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Ib VOC/gal solids	Transfer Efficiency
1449	12.2	59.00%	24.2%	34.8%	57.5%	42.32%	7.50E-05	6598.00	1.00E+01	1.79E-02	8.86E-03	0.21	0.04	5.44	10.06	50%
1564	11.2	70.00%	42.8%	27.2%	67.8%	30.22%	7.50E-05	6598.00	9.48E+00	1.43E-02	7.08E-03	0.17	0.03	3.65	10.10	50%
128-1562	11.0	54.35%	47.8%	6.6%	62.7%	37.31%	7.50E-05	6598.00	1.95E+00	7.27E-01	3.60E-01	8.63	1.57	5.45	1.95	50%
Total											0.38	9.01	1.64	14.54		
Controlled Emissions (tons/yr):																0.03

Methodology

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

**TSD Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads**

Company Name: White Flyer Targets
Address City IN Zip: 317 Kloeckner Drive, Knox, IN 46534
Permit Number: 149-32378-00027
Reviewer: Susann Brown
Date: November 15, 2012

Paved Roads at Industrial Site

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type of Traffic	Vehicle Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle Type 1 (entering plant) (one-way trip)	Box Trailer & Tractor	15.0	1.0	15.0	17.5	262.5	100	0.019	0.3	103.7
Vehicle Type 1 (leaving plant) (one-way trip)	Box Trailer & Tractor	15.0	1.0	15.0	40.0	600.0	100	0.019	0.3	103.7
Total				30.0		862.5			0.6	207.4

Average Vehicle Weight Per Trip = tons/trip
 Average Miles Per Trip = miles/trip

Unmitigated Emission Factor, $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$ (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	28.8	28.8	28.8	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
 where p = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
 N = days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	2.674	0.535	0.1313	lb/mile
Mitigated Emission Factor, $E_{ext} =$	2.445	0.489	0.1200	lb/mile

Type of Traffic	Vehicle Type	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle Type 1 (entering plant) (one-way trip)	Box Trailer & Tractor	0.14	0.03	0.01	0.13	0.03	0.01
Vehicle Type 1 (leaving plant) (one-way trip)	Box Trailer & Tractor	0.14	0.03	0.01	0.13	0.03	0.01
		0.28	0.06	0.01	0.25	0.05	0.01

Methodology

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

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particle Matter (<2.5 um)
 PTE = Potential to Emit

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

Company Name: White Flyer Targets
Address City IN Zip: 317 Kloeckner Drive, Knox, IN 46534
Permit Number: 149-32378-00027
Reviewer: Susann Brown
Date: November 15, 2012

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	7.0	1.0	7.0	40.0	280.0	300	0.057	0.4	145.2
Vehicle (leaving plant) (one-way trip)	7.0	1.0	7.0	17.5	122.5	300	0.057	0.4	145.2
Totals			14.0		402.5			0.8	290.3

Average Vehicle Weight Per Trip = tons/trip
 Average Miles Per Trip = miles/trip

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

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	28.8	28.8	28.8	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, $E_{ext} = E * [(365 - P)/365]$
 where P = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, E_f =	7.13	1.82	0.18	lb/mile
Mitigated Emission Factor, E_{ext} =	4.69	1.20	0.12	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.52	0.13	0.01	0.34	0.09	0.01
Vehicle (leaving plant) (one-way trip)	0.52	0.13	0.01	0.34	0.09	0.01
Totals	1.04	0.26	0.03	0.68	0.17	0.02

Methodology

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

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particulate Matter (<2.5 um)
 PTE = Potential to Emit

**TSD Appendix A: Emission Calculations
326 IAC 6-3-2 Compliance Summary**

Company Name: White Flyer Targets
Source Address: 317 Kloeckner Drive, Knox, IN 46534
Permit Number: M149-32378-00027
Reviewer: Susann Brown
Date: November 15, 2012

	Maximum Process Weight (lbs/hour)	Maximum Process Weight (tons/hour)	326 IAC 6-3 Allowable Particulate Emission Rate (lbs/hr) for each unit of that type	Uncontrolled PM Emission factor (lb/ton)	Uncontrolled PTE of PM (lbs/hr)	Is a Control Device Needed to Comply with 326 IAC 6-3-2?
Dry Material #1 - P03	6050.23	3.03	8.61	4.95	14.97	Yes
Dry Material #1 - P04	6050.23	3.03	8.61	4.95	14.97	Yes
Dry Material #1 - P012	2000.00	1.00	4.10	4.95	4.95	Yes
Dry Material #3 - P014	2273.97	1.14	4.47	4.95	5.63	Yes
Dry Mixer- P015	2273.97	1.14	4.47	4.95	5.63	Yes

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate is up to sixty thousand (60,000) pounds per hour:

$$E = 4.10 P^{0.67} \quad \text{where}$$

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

The controlled emission factors are from AP-42 Ch. 11.19.2-4 (8/04)

The uncontrolled total particulate matter emission factor was calculated from the controlled total particulate matter using the following equation:

$$\text{Uncontrolled emission factor} = \text{Controlled total particulate emission factor} (100\% - \text{Efficiency \%}) / 100\%$$

Methodology

This tab includes emission units that have uncontrolled PTE greater than 0.551 lbs/hr

Maximum Process Weight (lbs/hr) are from the Material Storage and the Mixing and Process tabs Maximum Throughput (lbs/hr)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
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SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Tim Gunter
White Flyer Targets
317 Kloeckner Dr
Knox, IN 46534

DATE: March 7, 2013

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

SUBJECT: Final Decision
MSOP
149-32378-00027

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:
Robert Dritschel, Responsible Official
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	DPABST 3/7/2013 White Flyer Targets 149-32378-00127 (Final)		Type of Mail: CERTIFICATE OF MAILING ONLY	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	Handling 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		Tim Gunter White Flyer Targets 317 Kloekner Dr Knox IN 46534 (Source CAATS) (CONFIRM DELIVERY)									
2		Robert Dritschel Regulatory Affairs Mgr White Flyer Targets 115 US Hwy 202 Ringoes NJ 08551 (RO CAATS)									
3		Starke County Health Department Courthouse, 1st Floor, Main St Knox IN 46534-1148 (Health Department)									
4		Starke County Board of Commissioners 53 E. Mound Knox IN 46534 (Local Official)									
5		Knox City Council and Mayors Office 101 W Washington Street Knox IN 46534 (Local Official)									
6		Mr. Brian Skeuse Regent Chemical Research 115 US Hwy 202 Ringoes NJ 08551 (Source - addl contact)									
7											
8											
9											
10											
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