



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: April 5, 2013

RE: Digger Specialties, Inc. / 099-32707-00101

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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Jesse Heines
Digger Specialties, Inc.
3639 Destiny Drive
Bremen, IN 46506

April 5, 2013

Re: F099-32707-00101
First Significant Revision to
F099-31373-00101

Dear Jesse Heines:

Digger Specialties, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F099-32707-00101 on June 26, 2012 for a stationary aluminum fencing manufacturing operation located at 3639 Destiny Drive, Bremen, Indiana 46506. On January 2, 2013, the Office of Air Quality (OAQ) received an application from the source requesting to install a new powder coating system, coating aluminum fencing. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, 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.

Digger Specialties, Inc.
Bremen, Indiana
Permit Reviewer: Sarah Street

Page 2 of 2
FESOP SPR No. 099-32707-00101

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 Sarah Street, of my staff, at 317-232-8427 or 1-800-451-6027, and ask for extension 2-8427.

Sincerely,



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC/ss

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



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

Digger Specialties, Inc.
3639 Destiny Drive
Bremen, Indiana 46506

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

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

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

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

Operation Permit No.: F099-31373-00101	
Original Signed by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: June 26, 2012 Expiration Date: June 26, 2022

Interim Significant Permit Revision No.: F099-32707I-00101, February 1, 2013

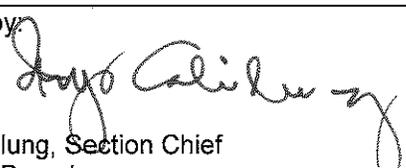
First Significant Permit Revision No.: F099-32707-00101	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 5, 2013 Expiration Date: June 26, 2022

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary aluminum fencing manufacturing operation.

Source Address:	3639 Destiny Drive, Bremen, Indiana 46506
General Source Phone Number:	574-546-2411
SIC Code:	3446 (Architectural and Ornamental Metal Work Mfg.)
County Location:	Marshall
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) powder coating booth, identified as the Main Powder Coating Booth, coating aluminum fencing, constructed in 2005 and modified in 2012, equipped with twelve (12) robotic spray nozzles and one (1) manual spray gun, with a maximum capacity of 150 pounds of powder coating per hour, controlled by two (2) modular powder coating recovery systems and venting within the building.

One modular powder coating recovery system is used to recover black powder and therefore considered as integral to the process. While the other modular powder coating recovery system is used as control because the non-black powder collected are not re-used.

- (b) One (1) powder repair coating booth, equipped with two (2) manual spray guns, constructed in 2008, with a maximum repair rate of 10 units per day, using filters for control and venting within the building.
- (c) One (1) powder coating booth, identified as Powder Coating Booth 2, approved for construction in 2013, coating aluminum fencing, equipped with twenty-four (24) automatic spray guns and two (2) manual spray guns, with a maximum system capacity of 520 pounds of powder coating per hour, equipped with one (1) integral cyclone for powder recovery, and equipped with one (1) filter as a secondary control, exhausting within the building.

Note: The exhaust after the integral cyclone and filter as secondary control is returned to the powder recovery room so that the exhaust from the powder coating booth is a closed loop system, with no discharge into the building.

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

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
 - (1) One (1) natural gas fired stage 1 pretreat burner, rated at 2 MMBtu per hour;
 - (2) One (1) natural gas dry off fired oven, rated at 1.5 MMBtu per hour;
 - (3) One (1) natural gas fired cure IR boost burner, rated at 0.504 MMBtu per hour;
 - (4) One (1) natural gas fired cure oven, rated at 2.5 MMBtu per hour;
 - (5) Three (3) natural gas fired building heaters, each rated at 0.7 MMBtu per hour;
 - (6) One (1) natural gas-fired washer heater, approved for construction in 2013, rated at 2 MMBtu per hour;
 - (7) One (1) natural gas-fired dry off oven, approved for construction in 2013, rated at 2 MMBtu per hour;
 - (8) One (1) natural gas-fired paint bake oven, approved for construction in 2013, rated at 2 MMBtu per hour;
 - (9) One (1) natural gas-fired air make-up unit, approved for construction in 2013, rated at 3.546 MMBtu per hour;
 - (10) One (1) natural gas-fired internal building heater, approved for construction in 2013, rated at 0.4 MMBtu per hour;
 - (11) One (1) natural gas-fired air make-up unit, approved for construction in 2013, rated at 0.27 MMBtu per hour;
- (b) Two (2) Tungsten Inert Gas (TIG) aluminum welding stations, constructed in 2006, each with a maximum wire usage rate of 0.34 pounds per hour.
- (c) One (1) electric MIG welder, constructed in 2012, using SuperGlaze 5356 ALMg5 wire with a 1.2 mm diameter for welding aluminum base plates, with a capacity of 1.25 pounds per hour of welding wire.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F099-31373-00101, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

- (1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and
- (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

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

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

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

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

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

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

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

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

(C) Corrective actions taken.

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

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

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

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

- (a) All terms and conditions of permits established prior to F099-31373-00101 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

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

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue

MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

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

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

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

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) and greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.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 2-8-4][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:
- (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the FESOP permit.

Records of required monitoring information include the following:

- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

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

Indianapolis, Indiana 46204-2251

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) powder coating booth, identified as the Main Powder Coating Booth, coating aluminum fencing, constructed in 2005 and modified in 2012, equipped with twelve (12) robotic spray nozzles and one (1) manual spray gun, with a maximum capacity of 150 pounds of powder coating per hour, controlled by two (2) modular powder coating recovery systems and venting within the building.

One modular powder coating recovery system is used to recover black powder and therefore considered as integral to the process. While the other modular powder coating recovery system is used as control because the non-black powder collected are not re-used.

- (b) One (1) powder repair coating booth, equipped with two (2) manual spray guns, constructed in 2008, with a maximum repair rate of 10 units per day, using filters for control and venting within the building.

- (c) One (1) powder coating booth, identified as Powder Coating Booth 2, approved for construction in 2013, coating aluminum fencing, equipped with twenty-four (24) automatic spray guns and two (2) manual spray guns, with a maximum system capacity of 520 pounds of powder coating per hour, equipped with one (1) integral cyclone for powder recovery, and equipped with one (1) filter as a secondary control, exhausting within the building.

Note: The exhaust after the integral cyclone and filter as secondary control is returned to the powder recovery room so that the exhaust from the powder coating booth is a closed loop system, with no discharge into the building.

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

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

D.1.1 PSD Minor Limit [326 IAC 2-2]

In order to render 326 IAC 2-2, the Permittee shall comply with the following:

The PM emissions from the Powder Coating Booth 2 shall not exceed 24.79 pounds of PM emitted per hour.

Compliance with this limit, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Particulate Matter Less Than 10 Microns (PM10) and PM2.5 [326 IAC 2-2][326 IAC 2-8-4]

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

Main Powder Coating Booth

- (a) The PM10 emissions from the Main Powder Coating Booth shall not exceed 21.6 pounds of PM10 emitted per hour.

- (b) The PM 2.5 emissions from the Main Powder Coating Booth shall not exceed 21.6 pounds of PM2.5 emitted per hour.

Powder Coating Booth 2

- (c) The PM10 emissions from the Powder Coating Booth 2 shall not exceed 0.04 pounds of PM10 emitted per hour.
- (d) The PM 2.5 emissions from the Powder Coating Booth 2 shall not exceed 0.04 pounds of PM2.5 emitted per hour.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from other emission units at this source, shall limit the sourcewide total potential to emit of PM10 and PM2.5 to less than 100 tons per 12 consecutive month period and shall render 326 IAC 2-2 (PSD) and 326 IAC 2-7 not applicable.

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

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Main Powder Coating Booth shall not exceed 0.72 pounds per hour when operating at a process weight rate of 150 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Powder Coating Booth 2 shall not exceed 1.66 pounds per hour when operating the powder coating booth at a process weight rate of 520 pounds per hour.

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

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

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

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

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

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

Compliance Determination Requirements

D.1.5 Particulate Matter (PM)

In order to demonstrate compliance with Conditions D.1.1, D.1.2, and D.1.3, the powder coating recovery systems for PM control shall be in operation and control emissions from the Main Powder Coating Booth and the Powder Coating Booth 2 at all times that the equipment is in operation. The Permittee shall operate the control devices in accordance with manufacturer's specifications.

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

D.1.6 Dust Collector Inspections

An inspection shall be performed semi-annually on the integral cyclone recovery system associated with the Powder Coating Booth 2.

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

Source Name: Digger Specialties, Inc.
Source Address: 3639 Destiny Drive, Bremen, Indiana 46506
FESOP Permit No.: F099-31373-00101

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Digger Specialties, Inc.
Source Address: 3639 Destiny Drive, Bremen, Indiana 46506
FESOP Permit No.: F099-31373-00101

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Source Name: Digger Specialties, Inc.
Source Address: 3639 Destiny Drive, Bremen, Indiana 46506
FESOP Permit No.: F099-31373-00101

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Technical Support Document (TSD) for a Significant Permit Revision to a
Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name: Digger Specialties, Inc.
Source Location: 3639 Destiny Drive, Bremen, Indiana 46506
County: Marshall
SIC Code: 3446 (Architectural and Ornamental Metal Work Mfg.)
Operation Permit No.: F099-31373-00101
Operation Permit Issuance Date: June 26, 2012
Significant Permit Revision No.: F099-32707-00101
Permit Reviewer: Sarah Street

On January 2, 2013, the Office of Air Quality (OAQ) received an application from Digger Specialties, Inc. related to a modification to an existing aluminum fencing manufacturing operation.

Existing Approvals

The source was issued FESOP Renewal No. F099-31373-00101 on June 26, 2012. The source has since received Interim Significant Permit Revision No. F099-32707-00101, issued on February 1, 2013.

County Attainment Status

The source is located in Marshall County.

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

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

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 or Appendix A of FESOP Renewal No. 099-31373-00101, issued on June 26, 2012.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Powder Coating Booth***	139.61	94.61	94.61	0.00	0.00	0.00	0.00	0.00	0.00	
Powder Repair Coating Booth	0.01	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	
Natural Gas Units (worst case ng or propane)	0.08	0.29	0.29	0.02	5.35	0.41	3.17	5,264.93	0.07	Hexane
TIG and MIG Welding	0.63	0.63	0.63	0.00	0.00	0.00	0.00	0.00	0.02	Manganese
Total PTE of Entire Source	140.33	95.54	95.54	0.02	5.35	0.41	3.17	5,264.93	0.09	
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

negl. = negligible
 These emissions are based upon TSD or Appendix A of FESOP Renewal No. 099-31373-00101, issued on June 26, 2012
 **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.
 *** One of the recovery systems is considered integral to the process, therefore permit level was determined after control. PM is not limited because the PTE before control is less than 250 tons/year.

- (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 Marshall County is an attainment county.
- (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 Digger Specialties, Inc. on January 2, 2013 relating to the construction and operation of a new powder coating system. The source has also applied to remove the propane backup fuel from the existing natural-gas fired units.

The following is a list of the new emission unit(s) and pollution control device(s):

- (a) One (1) powder coating booth, identified as Powder Coating Booth 2, approved for construction in 2013, coating aluminum fencing, equipped with twenty-four (24) automatic spray guns and two (2) manual spray guns, with a maximum system capacity of 520 pounds of powder coating per hour, equipped with one (1) integral cyclone for powder recovery, and equipped with one (1) filter as a secondary control, exhausting within the building.

Note: The exhaust after the integral cyclone and filter as secondary control is returned to the powder recovery room so that the exhaust from the powder coating booth is a closed loop system, with no discharge into the building.

The following is a list of the new insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
 - (1) One (1) natural gas-fired washer heater, approved for construction in 2013, rated at 2 MMBtu per hour;
 - (2) One (1) natural gas-fired dry off oven, approved for construction in 2013, rated at 2 MMBtu per hour;
 - (3) One (1) natural gas-fired paint bake oven, approved for construction in 2013, rated at 2 MMBtu per hour;
 - (4) One (1) natural gas-fired air make-up unit, approved for construction in 2013, rated at 3.546 MMBtu per hour;
 - (5) One (1) natural gas-fired internal building heater, approved for construction in 2013, rated at 0.4 MMBtu per hour;
 - (6) One (1) natural gas-fired air make-up unit, approved for construction in 2013, rated at 0.27 MMBtu per hour;

“Integral Part of the Process” Determination

The applicant has submitted the following information to justify why the cyclone reclaim system should be considered an integral part of the powder coating booth, identified as Powder Coating Booth 2:

- (1) The use of the powder recovery system allows the source to recover and reuse all powder that has not adhered during the coating process, which results in an overwhelming net economic benefit.
- (2) The existing powder coating booth, identified as Main Powder Coating Booth, has an integral reclaim system for the black powder only; however, for this new system, Powder Coating Booth 2, the reclaim system will work for all color powders used.
- (3) The powder coating system allows the source to reclaim and reuse 98% of the overspray material. The cost savings associated with the product recovery far outweighs of the cost of installation, operation and maintenance of the product recovery system.

IDEM, OAQ has evaluated the justifications and agreed that the powder coating cyclone recovery system be considered as an integral part of the powder coating process for Powder Coating Booth 2. Therefore, the permitting level will be determined using the potential to emit after the powder coating cyclone recovery system. Operating conditions in the proposed permit will specify that this powder coating cyclone recovery system shall operate at all times when the Powder Coating Booth 2 is in operation.

Note: The filter as a secondary control is not considered as integral to the process.

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 – FESOP Revision
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The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. 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	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Powder Coating Booth 2*	9.11	9.11	9.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas Combustion (new units)	0.09	0.34	0.34	0.03	4.47	0.25	3.76	5,402.21	0.08	0.08
Total PTE of Proposed Revision	9.20	9.45	9.45	0.03	4.47	0.25	3.76	5,402.21	0.08	0.08

negl. = negligible
 *Cyclone reclaim system is considered integral to the Powder Coating Booth 2. PTE after Control is used to determine permit level. PTE before integral control of PM is equal to 455.52 tons/year. Therefore, a PSD Minor limit for PM, PM10, and PM2.5 will be included in the permit with this revision. These emissions are before the secondary control (filter).

Pursuant to 326 IAC 2-8-11.1(g), this FESOP is being revised through a FESOP Significant Permit

Revision because the proposed revision requires adjustment of the FESOP emission limitations.

PTE of the Entire Source After Issuance of the FESOP 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 ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)									
	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Main Powder Coating Booth***	139.61	94.61	94.61	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Powder Coating Booth 2****	108.59	0.18	0.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Powder Repair Coating Booth	0.01	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas Units (worst case ng of propane) Combustion (existing units)	0.08 0.07	0.29	0.29	0.02	5.35 3.77	0.41 0.21	3.17	5,264.93 4,549.78	0.07	0.07 Hexane
Natural Gas Combustion (new units)	0.09	0.34	0.34	0.03	4.47	0.25	3.76	5,402.21	0.08	0.08 Hexane
TIG and MIG Welding	0.63	0.63	0.63	0.00	0.00	0.00	0.00	0.00	0.02	0.02 Manganese
Total PTE of Entire Source	140.33 249.00	95.54 96.06	95.54 96.06	0.02 0.05	5.35 8.24	0.41 0.45	3.17 6.92	5,264.93 9,951.99	0.09 0.18	0.15 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

negl. = negligible
 **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.
 *** One of the recovery systems is considered integral to the process, therefore permit level was determined after control. PM is not limited because the PTE before control is less than 250 tons/year.
 **** **The Cyclone reclaim system is considered integral to the Powder Coating Booth 2. PTE after Control is used to determine permit level. PTE before integral control of PM is equal to 455.52 tons/year. Therefore, a PSD Minor limit for PM, PM10, and PM2.5 will be included in the permit with this revision. The limited PTE are the emissions after the secondary control (filter).**

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 FESOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted)

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
Main Powder Coating Booth***	139.61	94.61	94.61	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Powder Coating Booth 2****	108.58	0.18	0.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Powder Repair Coating Booth	0.01	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas Combustion (existing units)	0.07	0.29	0.29	0.02	3.77	0.21	3.17	4,549.78	0.07	0.07 Hexane
Natural Gas Combustion (new units)	0.09	0.34	0.34	0.03	4.47	0.25	3.76	5,402.21	0.08	0.08 Hexane
TIG and MIG Welding	0.63	0.63	0.63	0.00	0.00	0.00	0.00	0.00	0.02	0.02 Manganese
Total PTE of Entire Source	249.00	96.06	96.06	0.05	8.24	0.45	6.92	9,951.99	0.18	0.15 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
negl. = negligible **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. *** One of the recovery systems is considered integral to the process, therefore permit level was determined after control. PM is not limited because the PTE before control is less than 250 tons/year. **** The Cyclone reclaim system is considered integral to the Powder Coating Booth 2. PTE after Control is used to determine permit level. PTE before integral control of PM is equal to 455.52 tons/year. Therefore, a PSD Minor limit for PM, PM10, and PM2.5 will be included in the permit with this revision. The limited PTE are the emissions after the secondary control (filter).										

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

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

- (1) The PM10 emissions from the Main Powder Coating booth shall not exceed 21.6 pounds of PM10 emitted per hour.
- (2) The PM 2.5 emissions from the Main Powder Coating booth shall not exceed 21.6 pounds of PM2.5 emitted per hour.

Note: Limits (1) and (2) are existing limits.

(3) The PM10 emissions from the Powder Coating Booth 2 shall not exceed 0.04 pounds of PM10 emitted per hour.

(4) The PM 2.5 emissions from the Powder Coating Booth 2 shall not exceed 0.04 pounds of PM2.5 emitted per hour.

Note: Limits (3) and (4) are new limits with this FESOP Significant Permit Revision. These limits are set to the potential emissions after the integral cyclone and after the filter. See Appendix A - Emission Calculations for details.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from other emission units at this source, shall limit the sourcewide total potential to emit of PM10 and PM2.5 to less than 100 tons per 12 consecutive month period and shall render 326 IAC 2-2 (PSD) and 326 IAC 2-7 not applicable.

(b) PSD Minor Source

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

(1) The PM emissions from the Powder Coating Booth 2 shall not exceed 24.79 pounds of PM emitted per hour.

Note: This PM limit is new with this FESOP Significant Permit Revision. The PM limit is set to make the total source-wide PM emissions less than 250 tons per year.

$$\begin{aligned} &= \text{PSD Minor Threshold, PM (tons/yr) - Limited PTE of all other Emission Units (tons/year)} \\ &= 249.00 - 140.41 \\ &= 108.59 \end{aligned}$$

$$\begin{aligned} &108.59 \text{ tons/year} * (2,000 \text{ lbs/ton} / 8,760 \text{ hours/year}) \\ &= 24.79 \text{ lbs/hr} \end{aligned}$$

This limit is required even though the cyclone control for PM is considered integral to the Powder Coating Booth 2.

Compliance with this limit, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) There are no 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 for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63 Subpart MMMM (4M)) are not included for this source because this source is not a major source for HAPs.
- (c) The powder coating booths are not subject to National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR 63, Subpart HHHHHH (6H)) because the powder coating booths do not use any coatings that contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). In addition, powder coating does not meet the definition of spray-applied surface coating operation pursuant to 40 CFR 63.11180.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63, Subpart XXXXXX (6X)), are not included because the facility is not one of the nine source categories listed in 40 CFR 63.11514(a).
- (e) There are no 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)

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

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-8-4 (FESOP)
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new powder coating booth is 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.
- (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.
- (g) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (h) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Powder Coating Booth 2

- (i) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the powder coating booth shall not exceed 1.66 pounds per hour when operating the powder coating booth at a process weight rate of 520 pounds per hour.

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

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

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

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

The powder coating cyclone recovery system and secondary control filter shall be in operation at all times the powder coating booth is in operation, in order to comply with this limit.

- (j) 326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8. Since the facilities at this source have the potential to emit less than 25 tons per year VOC, they are not subject to 326 IAC 8-1-6.
- (k) 326 IAC 8-2-9 (Miscellaneous Metal Coating)
Pursuant to 326 IAC 8-2-1, the powder coating operation is not subject to the requirements of 326 IAC 8-2-9, since the powder coating booth does not emit VOCs.
- (l) 326 IAC 3 (VOC Rules)
There are no VOC Rules applicable to this source.

Natural Gas-Fired Units

- (m) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
The natural gas-fired heaters, ovens, and air make-up units are not subject to the requirements of 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating), because, pursuant to 326 IAC 1-2-19, these emission units do not meet the definition of an indirect heating unit.
- (n) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The natural gas-fired heaters, ovens, and air make-up units are exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

Compliance Determination, Monitoring and Testing Requirements
--

- (a) The compliance determination and monitoring requirements applicable to this proposed revision are as follows:

In order to demonstrate compliance with the PSD Minor and FESOP limits the powder coating recovery systems for PM control shall be in operation and control emissions from the Powder Coating Booth 2 at all times that the equipment is in operation.

Control	Parameter	Frequency	Range	Excursions and Exceedances
Cyclone recovery system for powder coating booth	Filter inspection	Semi-annually	Normal-Abnormal	Response Steps

These monitoring conditions are necessary because the cartridge filter for the powder coating booth must operate properly to ensure compliance with the PSD Minor limits.

- (b) There are no testing requirements applicable to this proposed revision.

The exhaust after the integral cyclone and filter as secondary control is returned to the powder recovery room so that the exhaust from the powder coating booth 2 is a closed loop system, with no discharge into the building.

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No: 099-31373-00101, issued on June 26, 2012.

Proposed Changes

The following changes listed below are due to the proposed revision:

- (1) Sections A.2 and A.3 have been updated to show the new emission units that have been added with this permit revision.
- (2) The PSD Minor limits have been added to Section D.1
- (3) The FESOP limits in Section D.1 have been updated.
- (4) The PM limits required under 326 IAC 6-3-2 have been added to Section D.1.
- (5) The relevant compliance determination requirements have been added for the new powder coating booth.

Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:

...

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

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

...

- (c) **One (1) powder coating booth, identified as Powder Coating Booth 2, approved for construction in 2013, coating aluminum fencing, equipped with twenty-four (24) automatic spray guns and two (2) manual spray guns, with a maximum system capacity of 520 pounds of powder coating per hour, equipped with one (1) integral cyclone for powder recovery, and equipped with one (1) filter as a secondary control, exhausting within the building.**

Note: The exhaust after the integral cyclone and filter as secondary control is returned to the powder recovery room so that the exhaust from the powder coating booth is a closed loop system, with no discharge into the building

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

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
- (1) One (1) natural gas fired stage 1 pretreat burner, rated at 2 MMBtu per hour, ~~using propane as a backup fuel;~~
 - (2) One (1) natural gas dry off fired oven, rated at 1.5 MMBtu per hour, ~~using propane as a backup fuel;~~
 - (3) One (1) natural gas fired cure IR boost burner, rated at 0.504 MMBtu per hour, ~~using propane as a backup fuel;~~
 - (4) One (1) natural gas fired cure oven, rated at 2.5 MMBtu per hour, ~~using propane as a backup fuel; and~~
 - (5) Three (3) natural gas fired building heaters, each rated at 0.7 MMBtu per hour, ~~using propane as a backup fuel;~~
 - (6) **One (1) natural gas-fired washer heater, approved for construction in 2013, rated at 2 MMBtu per hour;**
 - (7) **One (1) natural gas-fired dry off oven, approved for construction in 2013, rated at 2 MMBtu per hour;**
 - (8) **One (1) natural gas-fired paint bake oven, approved for construction in 2013, rated at 2 MMBtu per hour;**
 - (9) **One (1) natural gas-fired air make-up unit, approved for construction in 2013, rated at 3.546 MMBtu per hour;**
 - (10) **One (1) natural gas-fired internal building heater, approved for construction in 2013, rated at 0.4 MMBtu per hour;**

- (11) **One (1) natural gas-fired air make-up unit, approved for construction in 2013, rated at 0.27 MMBtu per hour;**

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) powder coating booth, identified as the Main Powder Coating Booth, coating aluminum fencing, constructed in 2005 and modified in 2012, equipped with twelve (12) robotic spray nozzles and one (1) manual spray gun, with a maximum capacity of 150 pounds of powder coating per hour, controlled by two (2) modular powder coating recovery systems and venting within the building.

One modular powder coating recovery system is used to recover black powder and therefore considered as integral to the process. While the other modular powder coating recovery system is used as control because the non-black powder collected are not re-used.

- (b) One (1) powder repair coating booth, equipped with two (2) manual spray guns, constructed in 2008, with a maximum repair rate of 10 units per day, using filters for control and venting within the building.

- (c) **One (1) powder coating booth, identified as Powder Coating Booth 2, approved for construction in 2013, coating aluminum fencing, equipped with twenty-four (24) automatic spray guns and two (2) manual spray guns, with a maximum system capacity of 520 pounds of powder coating per hour, equipped with one (1) integral cyclone for powder recovery, and equipped with one (1) filter as a secondary control, exhausting within the building.**

Note: The exhaust after the integral cyclone and filter as secondary control is returned to the powder recovery room so that the exhaust from the powder coating booth is a closed loop system, with no discharge into the building

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

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

D.1.1 PSD Minor Limit [326 IAC 2-2]

In order to render 326 IAC 2-2, the Permittee shall comply with the following:

The PM emissions from the Powder Coating Booth 2 shall not exceed 24.79 pounds of PM emitted per hour.

Compliance with this limit, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.12 Particulate Matter Less Than 10 Microns (PM10) and PM2.5 [326 IAC 2-2][326 IAC 2-8-4]

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

Main Powder Coating Booth

- (a) The PM10 emissions from the **Main Powder Coating Booth** shall not exceed 21.6 pounds of PM10 emitted per hour.
- (b) The PM 2.5 emissions from the **Main Powder Coating Booth** shall not exceed 21.6 pounds of PM2.5 emitted per hour.

Powder Coating Booth 2

- (c) **The PM10 emissions from the Powder Coating Booth 2 shall not exceed 0.04 pounds of PM10 emitted per hour.**
- (d) **The PM 2.5 emissions from the Powder Coating Booth 2 shall not exceed 0.04 pounds of PM2.5 emitted per hour.**

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from other emission units at this source, shall limit the sourcewide total potential to emit of PM10 and PM2.5 to less than 100 tons per 12 consecutive month period and shall render 326 IAC 2-2 (PSD) and 326 IAC 2-7 not applicable.

D.1.23 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the **Main Powder Coating Booth** shall not exceed 0.72 pounds per hour when operating at a process weight rate of 150 pounds per hour.
- (b) **Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Powder Coating Booth 2 shall not exceed 1.66 pounds per hour when operating the powder coating booth at a process weight rate of 520 pounds per hour.**

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

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

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

D.1.34 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.45 Particulate Matter (PM)

In order to demonstrate compliance with Conditions D.1.1, ~~and~~ D.1.2, **and D.1.3**, the powder coating recovery systems for PM control shall be in operation and control emissions from the Main Powder Coating Booth **and the Powder Coating Booth 2** at all times that the equipment is in operation. **The Permittee shall operate the control devices in accordance with manufacturer's specifications.**

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

D.1.6 Dust Collector Inspections

An inspection shall be performed semi-annually on the integral cyclone recovery system associated with the Powder Coating Booth 2.

...

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 January 2, 2013. Additional information was received on February 18, 2013.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 099-32707-00101. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Sarah Street 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) 232-8427 or toll free at 1-800-451-6027 extension 2-8427.
- (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

**Appendix A: Emission Calculations
Emissions Summary**

Company Name: Digger Specialties Inc.

Address: 3639 Destiny Drive, Bremen IN 46506

FESOP Significant Permit Revision No.: 099-32707-00101

Reviewer: Sarah Street

Uncontrolled Potential to Emit of Revision (tons/year)											
Units	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	GHG as CO ₂ e	Total HAPs	Single HAP	Worst Single HAP
Powder Coating Booth 2*	9.11	9.11	9.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Natural Gas Combustion (new units)	0.09	0.34	0.34	0.03	4.47	0.25	3.76	5,402.21	0.08	0.08	Hexane
Total	9.20	9.45	9.45	0.03	4.47	0.25	3.76	5,402.21	0.08	0.08	Hexane

*Cyclone reclaim system is considered integral to the Powder Coating Process Unit 2. PTE after Control is used to determine permit level. PTE before integral control of PM is equal to 455.52 tons/year. Therefore, a PSD Minor limit for PM, PM10, and PM2.5 will be included in the permit with this revision.

Uncontrolled Potential to Emit after Revision (tons/year)											
Units	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	GHG as CO ₂ e	Total HAPs	Single HAP	Worst Single HAP
Main Powder Coating Booth	139.61	139.61	139.61	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Powder Coating Booth 2*	9.11	9.11	9.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Powder Repair Coating Booth	0.01	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Natural Gas Combustion (existing units)	0.07	0.29	0.29	0.02	3.77	0.21	3.17	4,549.78	0.07	0.07	Hexane
Natural Gas Combustion (new units)	0.09	0.34	0.34	0.03	4.47	0.25	3.76	5402.21	0.08	0.08	Hexane
Welding - TIG and MIG	0.63	0.63	0.63	0.00	0.00	0.00	0.00	0.00	0.02	0.02	Manganese
Total	149.52	149.99	149.99	0.05	8.24	0.45	6.92	9,951.99	0.18	0.15	Hexane

*Cyclone reclaim system is considered integral to the Powder Coating Process Unit 2. PTE after Control is used to determine permit level. PTE before integral control of PM is equal to 455.52 tons/year. Therefore, a PSD Minor limit for PM, PM10, and PM2.5 will be included in the permit with this revision. See table below.

Limited Potential to Emit after Revision (tons/year)											
Units	PM	PM10	PM2.5	SO ₂	NOx	VOC	CO	GHG as CO ₂ e	Total HAPs	Single HAP	Worst Single HAP
Main Powder Coating Booth	139.61	94.61	94.61	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Powder Coating Booth 2	108.59	0.18	0.18	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Powder Repair Coating Booth	0.01	0.01	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Natural Gas Combustion (existing units)	0.07	0.29	0.29	0.02	3.77	0.21	3.17	4,549.78	0.07	0.07	Hexane
Natural Gas Combustion (new units)	0.09	0.34	0.34	0.03	4.47	0.25	3.76	5,402.21	0.08	0.08	Hexane
Welding - TIG and MIG	0.63	0.63	0.63	0.00	0.00	0.00	0.00	0.00	0.02	0.02	Manganese
Total	249.00	96.06	96.06	0.05	8.24	0.45	6.92	9,951.99	0.18	0.15	Hexane

**Appendix A: Emission Calculations
Main Powder Coating Operation**

Company Name: Digger Specialties Inc.
Address: 3639 Destiny Drive, Bremen IN 46506
FESOP Significant Permit Revision No.: 099-32707-00101
Reviewer: Sarah Street

Uncontrolled Potential to Emit

Coating	Material usage lb/hr	Transfer Efficiency	PM%	Control Efficiency*	Hours/year	PM/PM10 Total Uncontrolled PTE (ton/yr)
Black	150	0.75	85%	99.9%	8760	0.14
Color	150	0.75	85%	n/a	8760	139.61

Worst case
uncontrolled
PTE ** 139.61 tons per year

Controlled Potential to Emit

Coating	Material usage lb/hr	Transfer Efficiency	PM%	Control Efficiency	Hours/year	PM/PM10 Total Controlled PTE (ton/yr)
Black	150	0.75	85%	99.9%	8760	0.14
Color	150	0.75	85%	99.9%	8760	0.14

Worst case
controlled PTE
** 0.14 tons per year
Limited PTE 21.60 lb PM 10/hr
Limited PTE 94.61 tons PM10/yr

Assume PM10=PM2.5

*Powder Recovery System considered integral to black powder coating process, therefore uncontrolled PTE is equal to controlled PTE.
Uncontrolled PTE (Black) with powder reclaim system control
Uncontrolled PTE (Color) without powder reclaim system filter control

**The colored and Black powder coating operations are mutually exclusive. Therefore total PTE is based on the worst case coating.

Powder coatings used in this operation contain no VOCs or HAPs.
Calculations based upon 8760 hours/year

Black Coating Total uncontrolled PTE =(material usage (lb/hr))*(1-transfer efficiency)*(PM%)*(1-Controll Efficiency)*(8760)/2000
Color Coating Total uncontrolled PTE =(material usage (lb/hr))*(1-transfer efficiency)*(PM%)*(8760)/2000

Total controlled PTE =(material usage (lb/hr))*(1-transfer efficiency)*(PM%)*(1-Control Efficiency)*(8760)/2000

PM% based upon particle distribution testing performed by manufacturer.
Control Efficiency of 99.9% for the powder recovery system.

Allowable PM = 4.10 * P^{0.67} (lb/hr) 0.72 lbs/hr 3.15 Limited PM
P = Proces weight rate (tons/hr) 0.075 tons/hr

**Appendix A: Emission Calculations
Powder Coating Unit 2**

Company Name: Digger Specialties Inc.
Address: 3639 Destiny Drive, Bremen IN 46506
FESOP Significant Permit Revision No.: 099-32707-00101
Reviewer: Sarah Street

Coating Booth Specifications

No. of Automatic Spray Guns	24
No. of Manual Spray Guns	2
Individual Gun Capacity (lb/hr)	20
Total System Capacity (lb/hr)	520

Methodology

Total System Capacity (lb/hr) = Total Number of Guns (26) * Individual Gun Capacity (lb/hr per gun)

Uncontrolled Potential to Emit

Coating	Material Usage lb/hr	Transfer Efficiency*	PM%	PTE Before Controls		PTE After Integral Cyclone			PTE After Filter		
				PM/PM10/PM2.5 (lb/hr)	PM/PM10/PM2.5 (ton/yr)	Control Efficiency*	PM/PM10/PM2.5 (lb/hr)	PM/PM10/PM2.5 (ton/yr)	Control Efficiency*	PM/PM10/PM2.5 (lb/hr)	PM/PM10/PM2.5 (ton/yr)
All	520	80%	100%	104.00	455.52	98.0%	2.08	9.11	98.0%	0.04	0.18

FESOP Limits, PM10 and PM2.5

Limited PTE	0.04	lb/hr
Limited PTE	0.18	tons/year

PSD Minor Limit: PM

Notes

Unlike the existing Main Powder Coating Booth, this new booth (Powder Coating Unit 2) will recover for reuse all colors applied through the use of a cyclone separator and a secondary filtration system.

The exhaust after the integral cyclone and filter as secondary control is returned to the powder recovery room so that the exhaust from the powder coating booth is a closed loop system, with no discharge into the building.

*Transfer Efficiency and Control Efficiency supplied by source

Assume PM=PM10=PM2.5

Powder coatings used in this operation contain no VOCs or HAPs.

Calculations based upon 8760 hours/year

	PM
Limited PTE of all other units (ton/yr)	140.41
PSD Minor Threshold (ton/yr)	249.00
Difference (ton/yr)	108.59

PSD Minor Limit (lb/hr) 24.79

Methodology

PTE Before Controls (lb/hr) = Material usage (lb/hr) * (100% - Transfer Efficiency (%)) * PM (%)

PTE Before Controls (ton/yr) = Material usage (lb/hr) * (100% - Transfer Efficiency (%)) * PM (%) * 8,760 hours * 1 ton/2,000 lb

PTE After Integral Cyclone (lb/hr) = PTE Before Controls (lb/hr) * (100% - Control Efficiency (%))

PTE After Integral Cyclone (ton/yr) = PTE Before Controls (ton/yr) * (100% - Control Efficiency (%))

PTE After Filter (lb/hr) = PTE After Integral Cyclone (lb/hr) * (100% - Control Efficiency (%))

PTE After Filter (ton/yr) = PTE After Integral Cyclone (ton/yr) * (100% - Control Efficiency (%))

326 IAC 6-3-2 Allowable Emissions

P = Process weight rate (tons/hr)

Allowable PM = 4.10 * P^{0.67} (lb/hr)

	0.26	tons/hr
	1.66	lbs/hr

**Appendix A: Emission Calculations
Powder Coating Recovery System Economic Analysis**

**Company Name: Digger Specialties Inc.
Address: 3639 Destiny Drive, Bremen IN 46506**

FESOP Significant Permit Revision No.: 099-32707-00101

Reviewer: Sarah Street

Digger Specialities Emission Evaluation	
Powercoat Line	
Powercoat booth Specs	
Filter Area	22,960 sq ft
Filter/Air Ratio	2.8 acfm/ft2
Filter Efficiency	99.90%
Collector Flowrate	8,200 acfm
Black Powdercoat Volume	30%
Color Volume	70.00%
Reclaim - Black	98.00%
Color Reclaim	0
Power Application Rate	150 lbs/Hr
Transfer Efficiency	75.00%
Particulate PM100%	85.00%

Powdercoat Process Emissions	
Powder Delivery Rate	150 lbs/Hr
Transfer Efficiency	75.00%
"Overspray"	37.5 lbs/Hr
Total PM 100	31.875 lbs/Hr

Emissions By Color (before Control)	
Black	9.5625 lbs/hr
Color	22.3125 lbs/hr
After Control	
Black	0.0095625 lbs/hr
Color	0.0223125 lbs/hr
Net Emissions/Hr BC	0.031875 lbs/hr
Actual Hours TPY	0.031875 TPY
Potential TPY	0.1396125 TPY

Payback Calculations		
	Material Cost	
Reclaim Rate	11.25 lbs/Hr	
Powder Coat Costs	\$ per Lb	\$ per hr
Black	\$4.50	\$50.63
Capital Cost	\$20,000	
Annual Operation/Maintenance Cost*	\$750.00	
Hours to Recover	409.88	

*Annual Operation/Maintenance Cost based on actual cost for 2006

**Appendix A: Emission Calculations
Powder Repair Coating Operation**

**Company Name: Digger Specialties Inc.
Address: 3639 Destiny Drive, Bremen IN 46506**

FESOP Significant Permit Revision No.: 099-32707-00101

Reviewer: Sarah Street

Coating	Material usage⁽¹⁾ (unit/hr)	Material usage⁽²⁾ (lb/unit)	Material usage (lb/hr)	Transfer Efficiency⁽³⁾	PM⁽⁴⁾ %	Control Efficiency⁽⁴⁾	PM/PM10 Total Uncontrolled PTE	PM/PM10 Total Controlled PTE (ton/yr)
Powder Repair Booth	0.42	0.018	0.008	0.75	100%	98.0%	0.01	1.7E-04

Methodogy

Controlled PTE =(material usage (lb/hr))*(1-transfer efficiency)*(PM%)*(1-Controll Efficiency)*(8760)/2000

Uncontrolled PTE =(material usage (lb/hr))*(1-transfer efficiency)*(PM%)*(8760)/2000

Assume PM10=PM2.5

Notes:

⁽¹⁾ Information provided by source on December 18, 2008, indicated that maximum 10 units per day

Therefore maximum unit per hour was calculated as follows:

maximum unit per hour = 10 units/day * 1day/24 hours = 0.42 units/hour

⁽²⁾ Information provided by source on December 19, 2008, indicated that maximum 0.0177 pounds per part

⁽³⁾ Transfer Efficiency is based on permit 099-24736-00101, issued on October 25, 2007

Also Powder coatings used in this operation contain no VOCs or HAPs as indicated in the permit 099-24736-0010.

⁽⁴⁾ Information provided by source on December 18, 2008.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only**

MM BTU/HR <100

Company Name: Digger Specialties Inc.

Address: 3639 Destiny Drive, Bremen IN 46506

FESOP Significant Permit Revision No.: 099-32707-00101

Reviewer: Sarah Street

Unit	MMBtu/hr
ng fired stage 1 pretreat burner	2.00
ng fired dry off fired oven	1.50
ng fired cure IR boost burner	0.504
ng fired cure oven	2.50
ng fired building heaters, 0.7 each	2.10
Total	8.604

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
8.604	1000	75.4

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.07	0.29	0.29	0.02	3.77	0.21	3.17

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	7.914E-05	4.522E-05	2.826E-03	6.783E-02	1.281E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.884E-05	4.145E-05	5.276E-05	1.432E-05	7.914E-05
Total HAPs					7.112E-02

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	4,522	0.1	0.1
Summed Potential Emissions in tons/yr	4,522		
CO2e Total in tons/yr	4,550		

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) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
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).

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Company Name: Digger Specialties Inc.

Address: 3639 Destiny Drive, Bremen IN 46506

FESOP Significant Permit Revision No.: 099-32707-00101

Reviewer: Sarah Street

Unit	MMBtu/hr
NG Washer Burner	2.00
NG Dry Off Oven	2.00
NG Cure Oven	2
NG Air Make Up (Washer & Oven)	3.546
NG Space Heater	0.40
NG Air Make Up (Recycling Room)	0.27
Total	10.22

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
10.22	1000	89.5

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.09	0.34	0.34	0.03	4.47	0.25	3.76

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 PM2.5 emission factor is filterable and condensable PM2.5 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	9.397E-05	5.370E-05	3.356E-03	8.054E-02	1.521E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.237E-05	4.922E-05	6.264E-05	1.700E-05	9.397E-05

Total HAPs	8.444E-02
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The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2 120,000	CH4 2.3	N2O 2.2
Potential Emission in tons/yr	5,370	0.1	0.1
Summed Potential Emissions in tons/yr	5,370		
CO2e Total in tons/yr	5,402		

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) = Heat Input Capacity (MMBtu/hr) x 8.760 hrs/yr x 1 MMCF/1,000 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
 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).

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

Company Name: Digger Specialties Inc.
Address: 3639 Destiny Drive, Bremen IN 46506
FESOP Significant Permit Revision No.: 099-32707-00101
Reviewer: Sarah Street

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Tungsten Inert Gas (TIG)(aluminum)(E70S)	2	0.34	0.0052	0.0032	0.00001	0.00001	0.004	0.002	0.000	0.0000068	0.002
MIG WELDING - Aluminum MIG Welder using SuperGlaze 5356 ALMg5 wire	1	1.25	0.1124	0.0022	0.0000	0.0000	0.141	0.003	0.000	0.00E+00	0.003
EMISSION TOTALS											
Potential Emissions lbs/hr							0.14				0.00
Potential Emissions lbs/day							3.46				0.12
Potential Emissions tons/year							0.63				0.02

Methodology

MIG Welder - source supplied emission factors for calculations.

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

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

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

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

Welding and other flame cutting emission factors are from an internal training session document, "Welding and Flame Cutting".

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



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
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Toll Free (800) 451-6027
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SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Jessie Heines
Digger Specialties, Inc.
3639 Destiny Drive
Bremen, IN 46506

DATE: April 5, 2013

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

SUBJECT: Final Decision
Significant Permit Revision
099-32707-00101

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:
Jim Heim – Bruce Carter Associates
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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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April 5, 2013

TO: Bremen Public Library

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

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

Applicant Name: Digger Specialties, Inc.
Permit Number: 099-32707-00101

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

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

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

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5		Marshall County Health Department 112 W Jefferson Street, Suite 103 Plymouth IN 46563-1764 (Health Department)										
6		Ms. Julie Grzesiak 139 N. Michigan St. Argos IN 46501 (Affected Party)										
7		Jim Heim Bruce Carter Associates 616 South 4th Street Elkhart IN 46516 (Consultant)										
8		Irvin N. Brown 1706 Inwood Road South Bend IN 46614 (Affected Party)										
9		Donald R. & Marceil Zeltwanger 1675 Bittersweet Drive Bremen IN 46506 (Affected Party)										
10		Charles & Janice Spencer 890 Elm Road Bremen IN 46506 (Affected Party)										
11		Shane A. & Kristy J. Kline 2324 S.R. 331 Bremen IN 46506 (Affected Party)										
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