



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: August 13, 2014

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

Source Name: Koester Metals, Inc.

Permit Level: FESOP – Renewal

Permit Number: 151-34115-00042

Source Location: Location street address, location city, IN

Type of Action Taken: Permit Renewal

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 matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 34115.

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

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

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.

(continues on next page)

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.



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Koester Metals, Inc
301 West Water Street
Fremont, Indiana 46737**

(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.: F151-34115-00042	
Issued by:  Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 12, 2014 Expiration Date: August 12, 2024

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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 electrical enclosures fabrication, assembly, and surface coating plant.

Source Address:	301 West Water Street, Fremont, Indiana 46737
General Source Phone:	(260) 495-1818
SIC Code:	3644
County Location:	Steuben
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD 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) manual powder coating spray booth, identified as P-1, using an air atomized application system, processing at a maximum of 42 metal enclosures per hour and spraying at a maximum capacity of 24 pounds of powder per hour, utilizing a dry particulate filter for particulate control and exhausting at one (1) stack (S/V ID: NV17);
- (b) One (1) manual powder coating spray self-contained booth, identified as P-2, using four (4) air atomization spray guns, spraying at a maximum capacity of 24 pounds of powder per hour and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (c) One (1) high-volume electrostatic powder coating self-contained booth, identified as P-B, equipped with eighteen (18) automatic powder spray guns and two (2) manual powder spray guns, with a maximum capacity of one hundred and twenty (120) pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (d) One (1) high-volume electrostatic powder coating self-contained booth, identified as P-C, equipped with eighteen (18) automatic powder spray guns and two (2) manual powder spray guns, with a maximum capacity of one hundred and twenty (120) pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (e) One (1) low-volume electrostatic powder coating booth, identified as P-3, equipped with two (2) manual powder spray guns, with a maximum capacity of spraying 14.2 pounds of powder per hour, utilizing a dry particulate filter for particulate control and exhausting through one (1) stack (S/V ID: NV3); and

- (f) One (1) powder coating self-contained booth, identified as P-4, consisting of two (2) high volume-low pressure (HVLP) spray guns with maximum capacity of 14.2 pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building.

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

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, consisting of the following:
 - (1) one (1) air makeup unit rated at 5.39 MMBtu/hr;
 - (2) one (1) pretreatment process water heater rated at 0.938 MMBtu/hr;
 - (3) one (1) pretreatment process water heater rated at 0.789 MMBtu/hr;
 - (4) one (1) pretreatment dry-off oven rated at 0.4 MMBtu/hr;
 - (5) four (4) area heaters each rated at 0.4 MMBtu/hr;
 - (6) one (1) carrier burn-off oven rated at 0.30 MMBtu/hr;
 - (7) sixteen (16) infrared hanging heaters with a total rating of 0.96 MMBtu/hr;
 - (8) two (2) cure ovens each rated at 1.65 MMBtu/hr;
 - (9) one (1) dry off oven rated at 1.65 MMBtu/hr;
 - (10) one (1) HV cure oven rated at 3.10 MMBtu/hr;
 - (11) one (1) cure oven rated at 3.00 MMBtu/hr; and
 - (12) one (1) HVAC unit rated at 0.45 MMBtu/hr.
- (b) Fuel oil-fired combustion sources with heat input equal to or less than two million Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight, consisting of the following:
 - (1) one (1) waste-oil fired heater rated at 0.225 MMBtu/hr.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
 - (1) spot welding of metal enclosures
- (d) Grinding and machining operations including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations:
 - (1) one (1) fully enclosed sand blasting cabinet, identified as SB1, utilizing a baghouse (BH7) for particulate control exhausting through one stack;
 - (2) three (3) fully enclosed sand blasting cabinet, identified as SB2 fully self contained;

- (3) Two (2) inert gas laser cutter, identified as LVD3020 and LVD4020, utilizing a baghouses, identified as Torit-LASR003C, for particulate control
- (4) One (1) inert gas laser cutter, identified as Cincinnati Laser Cutter, utilizing a baghouses, identified as Amtech-AT-4, for particulate control
- (e) The following emission units with VOC emissions below 5 pounds per hour or 15 pounds per day:
 - (1) one (1) three stage washer system utilizing non-VOC detergents; and
 - (2) one (1) pretreatment wash booth utilizing non-VOC detergents
- (f) The following emission units emitting greater than 1 pounds per day but less than 5 pounds per day or 1 ton per year of a single HAP:
 - (1) one (1) gasket applicator robot identified as G-1; and
 - (2) one (1) gasket applicator robot identified as G-2.

A.4 Other 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 which are not specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (b) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (c) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (d) Grinding and machining operations including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations:
 - (1) Two (2) six-inch belt sanders
 - (2) two (2) wheel grinders

A.5 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, F151-34115-00042, 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 F151-34115-00042 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(42). 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 one hundred (100) tons per twelve (12) consecutive month period.

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:
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 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, 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).

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

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

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

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

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

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

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

- (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.

Records of required monitoring information include the following, where applicable:

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

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. 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.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) manual powder coating spray booth, identified as P-1, using an air atomized application system, processing at a maximum of 42 metal enclosures per hour and spraying at a maximum capacity of 24 pounds of powder per hour, utilizing a dry particulate filter for particulate control and exhausting at one (1) stack (S/V ID: NV17);
- (b) One (1) manual powder coating spray self-contained booth, identified as P-2, using four (4) air atomization spray guns, spraying at a maximum capacity of 24 pounds of powder per hour and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (c) One (1) high-volume electrostatic powder coating self-contained booth, identified as P-B, equipped with eighteen (18) automatic powder spray guns and two (2) manual powder spray guns, with a maximum capacity of one hundred and twenty (120) pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (d) One (1) high-volume electrostatic powder coating self-contained booth, identified as P-C, equipped with eighteen (18) automatic powder spray guns and two (2) manual powder spray guns, with a maximum capacity of one hundred and twenty (120) pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (e) One (1) low-volume electrostatic powder coating booth, identified as P-3, equipped with two (2) manual powder spray guns, with a maximum capacity of spraying 14.2 pounds of powder per hour, utilizing a dry particulate filter for particulate control and exhausting through one (1) stack (S/V ID: NV3); and
- (f) One (1) powder coating self-contained booth, identified as P-4, consisting of two (2) high volume-low pressure (HVLP) spray guns with maximum capacity of 14.2 pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building.

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

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

D.1.1 FESOP and PSD Limits [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, PM, PM10, and PM2.5 emissions from P-1, P-2, P-3, P-B, P-C and P-4 shall not exceed 1.0 lbs/hr, each.

Compliance with this limit, in conjunction with the potential to emit of PM, PM10, and PM2.5 from all other units at the source, shall limit the potential to emit of PM, PM10, PM2.5 from the entire source to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (PSD) not applicable.

D.1.2 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the PM emission from each powder coating operation P-B and P-C shall

each not exceed 0.62 pounds per hour when operating at a process weight flow rate of 120 pounds of powder per hour. This particulate limitation was calculated using the following equation:

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

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

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate (PM) emission rate from each powder coating operation, P-1, P-2, P-3 and P-4, shall not exceed 0.551 pounds per hour when operating at a process weight flow rate of less than 100 pounds of powder per hour

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

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

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

D.1.4 Particulate Control

In order to ensure compliance with condition D.1.1 and D.1.2, the dry particulate filters and the powder recovery equipment for particulate control shall be in operation and control emissions from the six (6) powder coating booths (P-B, P-C, P-1, P-2, P-3, P-4) at all times the six (6) powder coating booths (P-B, P-C, P-1, P-2, P-3 and P-4) are in operation.

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of the dry particulate filters and vacuum filters associated with the six (6) powder coating booths (P-B, P-C, P-1, P-2, P-3 and P-4) stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation of this permit.

D.1.6 Parametric Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry vacuum filters, and dry particulate filters, weekly observations shall be made of the overspray from the powder coating booths stacks while one or more of the booths are in operation. if a condition exists which

should result in a response step, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

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

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the stack exhaust once per shift. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections.
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by the condition.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, consisting of the following:
 - (1) one (1) air makeup unit rated at 5.39 MMBtu/hr;
 - (2) one (1) pretreatment process water heater rated at 0.938 MMBtu/hr;
 - (3) one (1) pretreatment process water heater rated at 0.789 MMBtu/hr;
 - (4) one (1) pretreatment dry-off oven rated at 0.4 MMBtu/hr;
 - (5) four (4) area heaters each rated at 0.4 MMBtu/hr;
 - (6) one (1) carrier burn-off oven rated at 0.30 MMBtu/hr;
 - (7) sixteen (16) infrared hanging heaters with a total rating of 0.96 MMBtu/hr;
 - (8) two (2) cure ovens each rated at 1.65 MMBtu/hr;
 - (9) one (1) dry off oven rated at 1.65 MMBtu/hr;
 - (10) one (1) HV cure oven rated at 3.10 MMBtu/hr;
 - (11) one (1) cure oven rated at 3.00 MMBtu/hr; and
 - (12) one (1) HVAC unit rated at 0.45 MMBtu/hr.
- (b) Fuel oil-fired combustion sources with heat input equal to or less than two million Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight, consisting of the following:
 - (1) one (1) waste-oil fired heater rated at 0.225 MMBtu/hr.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
 - (1) spot welding of metal enclosures
- (d) Grinding and machining operations including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations:
 - (1) one (1) fully enclosed sand blasting cabinet, identified as SB1, utilizing a baghouse (BH7) for particulate control exhausting through one stack;
 - (2) three (3) fully enclosed sand blasting cabinet, identified as SB2 fully self contained;
 - (3) Two (2) inert gas laser cutter, identified as LVD3020 and LVD4020, utilizing a baghouses, identified as Torit-LASR003C, for particulate control

- (4) One (1) inert gas laser cutter, identified as Cincinnati Laser Cutter, utilizing a baghouses, identified as Amtech-AT-4, for particulate control
 - (e) The following emission units with VOC emissions below 5 pounds per hour or 15 pounds per day:
 - (1) one (1) three stage washer system utilizing non-VOC detergents; and
 - (2) one (1) pretreatment wash booth utilizing non-VOC detergents
 - (f) The following emission units emitting greater than 1 pounds per day but less than 5 pounds per day or 1 ton per year of a single HAP:
 - (1) one (1) gasket applicator robot identified as G-1; and
 - (2) one (1) gasket applicator robot identified as G-2.
- (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

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

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

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, PM, PM10, and PM2.5 emissions from the following units shall not exceed the emission limits below:

Unit Description	PM/PM10/PM2.5 Emission Limit (lb/hr)
SB1	2.5
SB2	2.5
LVD 3020 and LVD 4020	2.5
Cincinnati Laser Cutter	2.5

Compliance with this limit, in conjunction with the potential to emit of PM, PM10, and PM2.5 from all other units at the source, shall limit the potential to emit of PM, PM10, PM2.5 from the entire source to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (PSD) not applicable.

D.2.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, particulate emissions from each of following operations shall not exceed the pound per hour limit listed in the table below:

Unit Description	Control Device ID	Max. Throughput Rate (tons/hr)	Particulate Emission Limit (lb/hr)
SB1	BH7	0.177	1.29
SB2	-	0.177	1.29
LVD 3020 and LVD 4020	Torit- LASR003C	0.125	1.02
Cincinnati Laser Cutter	Amtech-AT-4	0.125	1.02

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

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

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

D.2.3 Particulate Emissions Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

Emission Unit	Number of Natural Gas-fired Units	Pt (lb/MMBtu)
Air makeup	1	0.428
Process Water Heater	2	0.428
Pretreatment Dry-off Oven	1	0.428
Area Heaters	4	0.428
Carries Burn-off Oven	1	0.428
Infrared Hanging Heaters	16	0.428
Cure Ovens	3	0.428
Dry off Ovens	1	0.428
HV Cure Oven	1	0.428
HVAC	1	0.428
Waste-oil fired heater	1	0.428

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

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

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

D.2.5 Particulate Control

In order to ensure compliance with condition D.2.1, the baghouses (Torit-LASR003C, Amtech-AT-4 and BH7) for particulate control shall be in operation and control emissions from the shotblasters (SB1) and laser cutters (LVD 3020, LVD 4020, Cincinnati Laser Cutter) at all times that the shotblasters (SB1) and laser cutters are in operation.

D.2.6 Visible Emissions Notations

- (a) Visible emission notations of baghouses Torit-LASR003C, Amtech-AT-4 and BH7 stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month

and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.2.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.6, the Permittee shall maintain records of visible emission notations of the stack exhaust once per shift. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (b) Section C - General Record Keeping Requirementst contains the Permittee's obligation with regard to the records required by the condition.

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

Source Name: Koester Metals Inc.
Source Address: 301 West Water Street, Fremont, Indiana 46737
Mailing Address: 1441 Quality Dr., Defiance, OH 43512
FESOP No.: F 151-17851-00042

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance and Enforcement Branch
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

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

Source Name: Koester Metals Inc.
Source Address: 301 West Water Street, Fremont, Indiana 46737
Mailing Address: 1441 Quality Dr., Defiance, OH 43512
FESOP No.: F151-17851-00042

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)
<input type="checkbox"/> 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 and Enforcement Branch); and
<input type="checkbox"/> 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: Koester Metals Inc.
Source Address: 301 West Water Street, Fremont, Indiana 46737
Mailing Address: 1441 Quality Dr., Defiance, OH 43512
FESOP No.: F151-17851-00042

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Koester Metals, Inc
Source Location:	301 West Water Street, Fremont, IN 46737
County:	Steuben
SIC Code:	3644
Permit Renewal No.:	F151-34115-00042
Permit Reviewer:	Julie Alexander

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Koester Metals, Inc relating to the operation of a surface coating operation. On January 27, 2014, Koester Metals, Inc submitted an application to the OAQ requesting to renew its operating permit. Koester Metals, Inc was issued its first FESOP Renewal F151-17851-00042 on October 08, 2004.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) manual powder coating spray booth, identified as P-1, using an air atomized application system, processing at a maximum of 42 metal enclosures per hour and spraying at a maximum capacity of 24 pounds of powder per hour, utilizing a dry particulate filter for particulate control and exhausting at one (1) stack (S/V ID: NV17);
- (b) One (1) manual powder coating spray self-contained booth, identified as P-2, using four (4) air atomization spray guns, spraying at a maximum capacity of 24 pounds of powder per hour and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (c) One (1) high-volume electrostatic powder coating self-contained booth, identified as P-B, equipped with eighteen (18) automatic powder spray guns and two (2) manual powder spray guns, with a maximum capacity of one hundred and twenty (120) pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (d) One (1) high-volume electrostatic powder coating self-contained booth, identified as P-C, equipped with eighteen (18) automatic powder spray guns and two (2) manual powder spray guns, with a maximum capacity of one hundred and twenty (120) pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (e) One (1) low-volume electrostatic powder coating booth, identified as P-3, equipped with two (2) manual powder spray guns, with a maximum capacity of spraying 14.2 pounds of powder per hour, utilizing a dry particulate filter for particulate control and exhausting through one (1) stack (S/V ID: NV3); and
- (f) One (1) powder coating self-contained booth, identified as P-4, consisting of two (2) high volume-low pressure (HVLP) spray guns with maximum capacity of 14.2 pounds of

powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, consisting of the following:
 - (1) one (1) air makeup unit rated at 5.39 MMBtu/hr;
 - (2) one (1) pretreatment process water heater rated at 0.938 MMBtu/hr;
 - (3) one (1) pretreatment process water heater rated at 0.789 MMBtu/hr;
 - (4) one (1) pretreatment dry-off oven rated at 0.4 MMBtu/hr;
 - (5) four (4) area heaters each rated at 0.4 MMBtu/hr;
 - (6) one (1) carrier burn-off oven rated at 0.30 MMBtu/hr;
 - (7) sixteen (16) infrared hanging heaters with a total rating of 0.96 MMBtu/hr;
 - (8) two (2) cure ovens each rated at 1.65 MMBtu/hr;
 - (9) one (1) dry off oven rated at 1.65 MMBtu/hr;
 - (10) one (1) HV cure oven rated at 3.10 MMBtu/hr;
 - (11) one (1) cure oven rated at 3.00 MMBtu/hr; and
 - (12) one (1) HVAC unit rated at 0.45 MMBtu/hr.
- (b) Fuel oil-fired combustion sources with heat input equal to or less than two million Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight, consisting of the following:
 - (1) one (1) waste-oil fired heater rated at 0.225 MMBtu/hr.
- (c) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
 - (1) spot welding of metal enclosures
- (e) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (g) Grinding and machining operations including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations:

- (1) One (1) fully enclosed sand blasting cabinet, identified as SB1, utilizing a baghouse (BH7) for particulate control, exhausting through one stack;
 - (2) Two (2) six-inch belt sanders;
 - (3) Two (2) inert gas laser cutter, identified as LVD3020 and LVD4020, utilizing a baghouses, identified as Torit-LASR003C, for particulate control
 - (4) One (1) inert gas laser cutter, identified as Cincinnati Laser Cutter, utilizing a baghouses, identified as Amtech-AT-4, for particulate control
 - (5) Two (2) wheel grinders
- (h) The following emission units with VOC emissions below 5 pounds per hour or 15 pounds per day:
- (1) one (1) three stage washer system utilizing non-VOC detergents; and
 - (2) one (1) pretreatment wash booth utilizing non-VOC detergents
- (i) Other categories with PM emissions below 5 pounds per hour or 25 pounds per day:
- (1) seven (7) Metal Inert Gas (MIG) welding stations emitting less than 1 ton per year of a single HAP;
 - (2) six (6) Tungsten Inert Gas (TIG) welding stations emitting less than 1 ton per year of a single HAP;
 - (3) ten (10) MIG welding stations with PM emission less than 25 pounds per day;
 - (4) eight (8) TIG welding stations with PM emissions less than 25 pounds per day.
- (j) The following emission units emitting greater than 1 pounds per day but less than 5 pounds per day or 1 ton per year of a single HAP:
- (1) One (1) gasket applicator robot identified as G-1; and
 - (2) One (1) gasket applicator robot identified as G-2.

Trivial Activities

- (a) Grinding and machining operations including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations:
- (1) fifteen (15) hand grinders;
 - (2) fifteen (15) hand polishers;

Existing Approvals

Since the issuance of the FESOP F151-17851-00042 on October 8, 2004, the source has constructed or has been operating under the following additional approvals:

Permit Type	Permit Number	Issuance Date
Administrative Amendment	151-19763-00042	February 22, 2005
Administrative Amendment	151-20702-00042	March 23, 2005
Administrative Amendment	151-21032-00042	May 19, 2005
Administrative Amendment	151-26732-00042	July 16, 2008
Administrative Amendment	151-28175-00042	July 28, 2009

Enforcement Issue

In accordance with 326 IAC 2-8-3(h), a timely renewal application is one that is submitted at least nine (9) months prior to the expiration date of the source's existing operating permit. This source's existing permit will expire on October 8, 2014. The source's permit renewal application was not received by IDEM until January 27, 2013. IDEM is reviewing this matter and will take appropriate action.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Steuben County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

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

- (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. Steuben 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}**
 Steuben County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 Steuben 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.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	Greater than 250
PM ₁₀	Greater than 250
PM _{2.5}	Greater than 250
SO ₂	Less than 100
VOC	Less than 100
CO	Less than 100
NO _x	Less than 100
GHGs as CO ₂ e	Less than 100,000
Single HAP	Less than 10
Total HAP	Less than 25

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ and PM_{2.5} is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's PM₁₀ and PM_{2.5} emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of GHGs is less than one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year.
- (d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	CO _{2e}	Total HAPs
Powder Surface Coating	26.28	26.28	26.28	-	-	-	-	-	-
SB1	10.95	10.95	10.95	-	-	-	-	-	-
SB2	10.95	10.95	10.95						
Natural Gas Combustion	0.30	1.18	1.18	0.09	15.58	0.86	13.09	18,804	0.29
Fuel Oil-fired Combustion	0.01	0.02	0.01	0.50	0.14	2.39E-03	3.52E-02	152	4.83E-05
Welding	5.78	5.78	5.78	-	-	-	-	-	0.53
Machining, Grinding etc.	25.70	25.70	25.70	-	-	-	-	-	-
Part Washers	-	-	-	-	-	0.97	-	-	1.94E-03
G-1 & G-2	-	-	-	-	-	-	-	-	2.00
Total PTE of Entire Source	79.97	80.87	80.86	0.59	15.72	44.66	13.12	18,956	2.82
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO _{2e}	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO _{2e}	NA

negl. = negligible
 * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant".
 **PM_{2.5} listed is direct PM_{2.5}.

(a) FESOP Status

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and to render the requirements of 326 IAC 2-2 (PSD) not applicable, the source shall comply with the following:

- (1) The PM, PM10 and PM2.5 emissions from P-1, P-2, P-B, P-C, P-3 and P-4 shall not exceed 1.0 lbs/hr, each.

- (2) The PM, PM10 and PM2.5 emissions from each SB1 and SB2 shall not exceed 2.5 lbs/hr.
- (3) The PM, PM10, and PM2.5 emissions from the laser cutting operations controlled by Torit-LASR003C shall not exceed 2.5 lbs/hr.
- (4) The PM, PM10, and PM2.5 emissions from the laser cutting operations controlled by Amtech-AT-4 shall not exceed 2.5 lbs/hr.
- (b) This existing stationary source is not major for PSD because the emissions of each regulated pollutant, excluding GHGs, are less than two hundred fifty (<250) tons per year and it is not in one of the twenty-eight (28) listed source categories.
- (c) The source-wide GHG emissions are equal to or greater than one hundred thousand (>100,000) tons of CO₂ equivalent (CO₂e) emissions per year. GHG emissions do not affect the source PSD status.
- (d) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions 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).

Federal Rule Applicability

CAM

- (a) 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.

NSPS

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

NESHAP

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, Subpart MMMM are not included in the permit because the source is not a major source of HAPs.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Coil, Subpart SSSS are not included in the permit because the source is not a major source of HAPs.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, Subpart XXXXXX are not included in the permit because the source does not primarily engage in one of the nine listed categories.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, Subpart HHHHHH are not included in the permit because the powder coating material used at the source contains no HAPs.
- (g) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is subject to 326 IAC 1-6-3.

326 IAC 1-5-2 (Emergency Reduction Plans)

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

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1).

326 IAC 6.5 PM Limitations Except Lake County

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

State Rule Applicability – Individual Facilities

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

Powder Coating

- (a) Pursuant to 326 IAC 6-3-2, the particulate emissions from the two (2) powder coating spray booths, identified as P-B and P-C shall each be limited as follows:

Emission Unit	P (ton/hr)	E (lb/hr)	Emission Rate (lb/hr)	Control Emission Rate (lb/hr)	Control Device Needed?
P-B	0.06	0.62	18.00	0.36	Yes
P-C	0.06	0.62	18.00	0.36	Yes

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

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

- (b) Pursuant to 326 IAC 6-3-2, the particulate emissions from the four (4) powder coating spray booths, identified as P-1, P-2, P-3, P-4 shall not exceed 0.551 pound per hour when operating at any process weight below 100 pounds per hour.

Shotblasters

Pursuant to 326 IAC 6-3-2, the particulate emissions from the two (2) shotblasters, identified as SB1 and SB2, shall each be limited to a total of 1.29 pounds per hour when operating at a process weight rate of 354 pounds per hour.

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

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

P = process weight rate in tons per hour

The baghouse system, identified as BH7, shall be in operation at all times when SB1 is in operation, in order to comply with this limit. SB2 is not controlled, but all shotblasting operations shall take place in the fully self-contained system in order to comply with this limit.

Grinding and Welding

(a) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the emission units below shall each be limited as follows:

Emission Unit	P (ton/hr)	E (lb/hr)	Emission Rate (lb/hr)	Control Emission Rate (lb/hr)	Control Device Needed?
LVD 3020 and LVD 4020	0.125	1.02	90.00	0.45	Yes
Cincinnati Laser Cutter	0.125	1.02	90.00	0.45	Yes

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

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

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

- (b) Pursuant to 326 IAC 6-3-1(b)(9), the MIG welding operations are exempt from 326 IAC 6-3 because each process uses less than 625 pounds of rod per day.
- (c) Pursuant to 326 IAC 6-3-1(b)(14), the TIG welding operations and each belt sander are exempt from 326 IAC 6-3 because the process has a PTE of less than 0.551 pounds per hour.
- (d) Pursuant to 326 IAC 6-3-1(b)(13), processes that are defined as trivial activities pursuant to 326 IAC 2-7-1(40) are exempt from this rule. The miscellaneous grinding activities are trivial activities and therefor are exempt.

326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4.

The particulate matter emissions (Pt) shall be limited by the following equation:

Where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).

Q = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation.

Indirect Heating Units Which Began Operation After September 21, 1983						
Facility	Construction Date	Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)	Particulate Limitation, (Pt) (lb/MMBtu)	PM PTE based on AP-42 (lb/MMBtu)
Air makeup	*	5.39	36.335	0.428	0.428	0.0019
Process Water Heater	*	0.94+0.79	36.335	0.428	0.428	0.0019
Pretreatment Dry-off Oven	*	0.40	36.335	0.428	0.428	0.0019
Area Heaters	*	4*0.40	36.335	0.428	0.428	0.0019
Carries Burn-off Oven	*	0.30	36.335	0.428	0.428	0.0019
Infrared Hanging Heaters	*	16*0.96	36.335	0.428	0.428	0.0019
Cure Ovens	*	2*1.65+3.00	36.335	0.428	0.428	0.0019
Dry off Ovens	*	1.50	36.335	0.428	0.428	0.0019
HV Cure Oven	*	3.10	36.335	0.428	0.428	0.0019
HVAC	*	0.45	36.335	0.428	0.428	0.0019
Waste-oil fired heater	*	0.225	36.335	0.428	0.428	0.1428
<p>* All of the sources of indirect heating began operation after September 21, 1983. For this worst-case analysis, it is assumed that all sources of indirect heating have the same construction date and <i>all</i> space heaters and water heaters are considered sources of indirect heating.</p> <p>Where: Q = Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed.</p>						

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

Pursuant to 326 IAC 8-1-6, any facility that has a potential to emit 25 tons or more of VOC and are not otherwise regulated by this article, 326 IAC 20-48 or 326 IAC 20-56 shall reduce VOC emission using BACT. The source's potential to emit of VOC is below 25 tons per year and therefore is not subject to this rule.

326 IAC 8-2 (VOC Rules; Surface Coating Emission Limitations)

Pursuant to 326 IAC 8-2-1(a)(4), any surface coating facility described in this rule and are located in Indiana with emissions greater than 15 pounds of VOC per day before controls are subject to this rule. Koester Metals, Inc has VOC emission less than 15 pounds per day, therefore the source is not subject to this rule.

Compliance Determination and Monitoring Requirements

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

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

arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

Control	Emission Units	Parameter	Frequency	Range	Excursions and Exceedances
Dry Particulate Filters and Vacuum Filters	P-1, P-3 P-2, P-B, P-C and P-4	Visible Emissions	Daily	Normal-Abnormal	Response Steps
		Inspections to verify place placement, integrity and particle loading of the filters		noticeable change	
		observations of the overspray from the powder coating booths stacks	Weekly		
		inspections of the exhaust stacks to detect the presence of overspray on the rooftops and the nearby ground	Monthly		
BH7	SB1	Visible Emissions	Daily	Normal-Abnormal	
Torit-LASR003C	LVD 3020 and LVD 4020	Visible Emissions	Daily	Normal-Abnormal	
Amtech-AT-4	Cincinnati Laser Cutter	Visible Emissions	Daily	Normal-Abnormal	

Proposed Changes

The changes listed below have been made to Federally Enforceable State Operating Permit No. T151-17851-00042. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

Changes Affecting Conditions Throughout the Permit

- (a) *Multiple Conditions - Mailing Address*
 IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.
- (b) *Multiple Conditions - Timeframe References*
 IDEM, OAQ has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore, all references to timelines have been revised to "no later than" or "not later than".
- (c) *Multiple Conditions - Branch Name Updates*
 Several of IDEM's Branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to Permit Administration and Development Section and the Permits Branch have been changed to Permit Administration and Support Section. References to Asbestos Section, Compliance Data

Section, Air Compliance Section, and Compliance Branch have been changed to Compliance and Enforcement Branch.

- (d) *Multiple Conditions - Typographical Errors, Language Clarification*
Throughout the permit, typographical and grammatical errors have been corrected. Additionally, changes to language for clarification or to align with the current preferred permit language conventions have been made.

Changes Specific to Section A of the Permit

- (a) Condition A.1 has been updated with the new source definition and source status.
(b) Condition A.3 has been updated to include the change in equipment at the source.
(c) Condition A.5 has been moved to B.13.

SECTION A SOURCE SUMMARY

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

The Permittee owns and operates a stationary ~~electrical enclosures fabrication, assembly, and a surface coating plant operation.~~

Mailing Address: _____ 1441 Quality Dr., Defiance, OH 43512

Source Status: Federally Enforceable State Operating Permit
(FESOP) **Program**
Minor Source, under PSD 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)]

- (c) One (1) high-volume electrostatic powder ~~surface~~ coating self-contained booth, identified as P-B, equipped with eighteen (18) automatic powder spray guns and two (2) manual powder spray guns, with a maximum capacity of one hundred and twenty (120) pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (d) One (1) high-volume electrostatic powder ~~surface~~ coating self-contained booth, identified as P-C, equipped with eighteen (18) automatic powder spray guns and two (2) manual powder spray guns, with a maximum capacity of one hundred and twenty (120) pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (e) One (1) low-volume electrostatic powder ~~surface~~ coating booth, identified as P-3, equipped with two (2) manual powder spray guns, with a maximum capacity of spraying 14.2 pounds of powder per hour, utilizing a dry particulate filter for particulate control and exhausting through one (1) stack (S/V ID: NV3); and
- (f) One (1) ~~surface~~ powder coating self-contained booth, identified as P-4, consisting of two (2) high volume-low pressure (HVLP) spray guns with maximum capacity of 14.2 pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building.

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

- (g) Grinding and machining operations including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations:
- (1) one (1) fully enclosed sand blasting cabinet, identified as SB1, utilizing a baghouse (BH7) for particulate control, exhausting through one stack;
 - ~~(2) fifteen (15) hand grinders;~~
 - ~~(3) fifteen (15) hand polishers;~~
 - ~~(4) one (1) wheel grinder; utilizing a baghouse (BH6) for particulate control;~~
 - ~~(25) three (3) fully enclosed sand blasting cabinet, identified as SB2 fully self contained;~~
 - ~~(6) seventeen (17) six-inch belt sanders utilizing a baghouse (BH5) for particulate control;~~
 - ~~(7) Three (3) one (1) inert gas laser cutter utilizing a baghouse (BH6) for particulate control; and~~
 - (3) Two (2) inert gas laser cutter, identified as LVD3020 and LVD4020, utilizing a baghouses, identified as Torit-LASR003C, for particulate control**
 - (4) One (1) inert gas laser cutter, identified as Cincinnati Laser Cutter, utilizing a baghouses, identified as Amtech-AT-4, for particulate control**
 - ~~(8) two (2) wheel grinders.~~

A.4 Other 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 which are not specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.**
- (b) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.**
- (c) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.**
- (d) Grinding and machining operations including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations:**
 - (1) Two (2) six-inch belt sanders**
 - (2) two (2) wheel grinders**

A.45 FESOP Applicability [326 IAC 2-8-2]

~~A.5 — Prior Permits Superseded [326 IAC 2-1.1-9.5]~~

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

Changes Specific to Section B and C of the Permit

- (a) *Section B - Duty to Provide Information*
IDEM, OAQ has revised Section B - Duty to Provide Information by removing the statement that the submittal by the Permittee requires the certification by the "responsible official".
- (b) *Section B - Certification*
IDEM, OAQ has decided to clarify Section B - Certification to be consistent with the rule and to clarify that Section B - Certification only states what a certification must be.
- (c) *Section B - Preventive Maintenance Plan*
IDEM, OAQ has decided to clarify Section B - Preventive Maintenance Plan.
- (d) *Section B - Emergency Provisions*
IDEM, OAQ is revising Section B - Emergency Provisions to delete paragraph (h). 326 IAC 2-8-4(3)(C)(ii) allows that deviations reported under an independent requirement do not have to be included in the Quarterly Deviation and Compliance Monitoring Report.
- (e) *Section B - Deviation from Permit Requirements and Section C - General Reporting Requirements*
IDEM, OAQ has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, Section B - Deviation from Permit Requirements and Conditions has been removed and the requirements of that condition have been added to Section C - General Reporting Requirements. Paragraph (d) of Section C - General Reporting Requirements has been removed because IDEM, OAQ already states the timeline and certification needs of each report in the condition requiring the report.
- (f) *Section B - Permit Renewal*
IDEM, OAQ has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information. Therefore, Section B - Permit Renewal has been revised.
- (g) *Section B - Source Modification Requirement*
IDEM, OAQ has decided to reference 326 IAC 2 in Section B - Source Modification Requirement rather than the specific construction rule.
- (h) *Section C - Overall Source Limit*
IDEM, OAQ has added GHG and PM thresholds to the permit.

- (h) *Section C - Opacity*
IDEM, OAQ has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.
- (i) *Section C - Incineration*
IDEM, OAQ has revised Section C - Incineration to more closely reflect the two underlying rules.
- (m) *Section C - Asbestos Abatement Projects*
IDEM, OAQ has revised paragraph (g) of Section C - Asbestos Abatement Projects to match the rule language in 326 IAC 14-10-1(a).
- (n) *Section C - Performance Testing*
IDEM, OAQ has removed the first paragraph of Section C - Performance Testing due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.
- (o) *Section C - Compliance Monitoring*
IDEM, OAQ has revised Section C - Compliance Monitoring. The reference to recordkeeping has been removed due to the fact that other conditions already address recordkeeping. The voice of the condition has been changed to clearly indicate that it is the Permittee that must follow the requirements of the condition. IDEM is changing the Section C - Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.
- (p) *Section C - Instrument Specifications*
IDEM has clarified Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.
- (q) *Section C - Maintenance of Continuous Opacity Monitoring Equipment*
IDEM, OAQ has decided to remove Section C - Maintenance of Continuous Opacity Monitoring Equipment.
- (r) *Section C - Monitoring Methods*
IDEM, OAQ has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.
- (t) *Section C - Emergency Reduction Plans*
IDEM, OAQ has decided not to list the submission date of the ERP because the ERP can be updated without a permit change.
- (u) *Section C - Response to Excursions or Exceedances*
IDEM, OAQ has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit. IDEM, OAQ has decided to include a general condition title Response to Excursions and

Exceedances. The Permittee will be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal.

- (v) *Section C - Actions Related to Noncompliance Demonstrated by a Stack Test*
IDEM, OAQ has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was revised from "the receipt of the test results" to "the date of the test". There was confusion if the "receipt" was by IDEM, the Permittee or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.
- (x) *Section C - General Record Keeping Requirements*
IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping.
- (z) *Section C - Compliance with 40 CFR 82 and 326 IAC 22-1*
IDEM, OAQ has decided to simplify the referencing in Section C - Compliance with 40 CFR 82 and 326 IAC 22-1.

SECTION B GENERAL CONDITIONS

~~B.1 Permit No Defense [IC 13]~~

~~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.~~

B.21 Definitions [326 IAC 2-8-1]

B.32 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F151-~~47851~~-34115-00042, 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]

~~B.5 Termination of Right to Operate [326 IAC 2-8-3(h)]-4(4)]~~

~~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.6 Severability [326 IAC 2-8-4(4)]

~~B.76 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]~~

B.87 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. ~~The submittal by the Permittee does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).~~ Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) ***

~~B.9 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.108 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]~~

~~(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance.~~

~~(a) A certification submitted shall contain~~ **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 of truth, accuracy," as defined by 326 IAC 2-1.1-1(1), and completeness. This~~

~~(2) the certification, shall state states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.~~

~~(b) One (1) certification shall be included, using~~ **The 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) ***~~

B.149 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 ~~in letter form~~ no later than July 1 of each year to:

(b) ***

(c) ***

- (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 notification which shall be submitted ~~submittal~~ by the Permittee does require ~~the a~~ certification by the ~~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.1142 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (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 and implement** 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:

~~(b)~~ **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, ~~including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.~~

- (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 ~~or potential to emit.~~ **PMPs and their submittal do not require thea certification that meets the requirements of 326 IAC 2-8-5(a)(1) by the an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**
- (d) ***

B.4312 Emergency Provisions [326 IAC 2-8-12]

- (a) ***
- (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 ~~describes~~ **describe** the following:
 - (1) ***
 - (2) ***
 - (3) ***
 - (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 No.: ~~Number:~~ ***
Telephone No.: ~~Number:~~ 317-233-0178 (ask for **Office of Air Quality, Compliance and Enforcement Branch**)
Facsimile No.: ~~Number:~~ 317-233-6865
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.
 - (5) ***

The notification which shall be submitted by the Permittee does not require ~~thea~~ certification **that meets the requirements of 326 IAC 2-8-5(a)(1) by the an** "authorized individual" as defined by 326 IAC 2-1.1-1(1).
 - (6) ***
- (c) ***
- (d) ***

- (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) ***
- (g) ***
- (h) ~~The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report. Any emergencies that have been previously reported pursuant to paragraph (b)(5) of this condition and certified by an "authorized individual" need only referenced by the date of the original report.~~

~~B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]~~

- ~~(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:~~

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

~~using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.~~

~~The Quarterly Deviation and Compliance Monitoring Report does require the certification by the Authorized individual@ as defined by 326 IAC 2-1.1-1(1).~~

- ~~(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.~~

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

- (a) All terms and conditions of permits established prior to F151-34115-00042 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 ~~FESOP~~**Federally Enforceable State Operating Permit** modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. ~~[326 IAC 2-8-4(5)(C)]~~ The notification by the Permittee does require ~~the a~~ certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by ~~the an~~ "authorized individual" as defined by 326 IAC 2-1-.1-1(1).
- (b) ***
- (c) ***
- (d) ***

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(~~4042~~). The renewal application does require ~~the a~~ certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by ~~the 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, ~~IN~~**Indiana** 46204-2251

~~(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]~~

~~(4)(b)~~ A timely renewal application is one that is:

- (A1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B2) 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.
- ~~(2) If IDEM, OAQ upon receiving a timely and complete 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.~~

~~(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]~~

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) ***

(b) ***

Any such application ~~shall be certified by~~ **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 ~~the~~ administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

~~(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.~~

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 ~~this~~ **the** source that are described in 326 IAC 2-8-15(b) ~~through (d)~~, **and (c)** without a prior permit revision, if each of the following conditions is met:

(1) **

(2) ***

(3) The changes do not result in emissions which exceed the ~~emissions allowable under~~ **limitations provided in** this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) ***

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

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

(b) Emission Trades [326 IAC 2-8-15(e**b**)]
The Permittee may trade **emissions** increases and decreases ~~in emissions in~~ 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(e) ~~(b)~~.

(c) Alternative Operating Scenarios [326 IAC 2-8-15(e**c**)]

(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 ~~Permit Revision~~ Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2-~~and~~
~~326 IAC 2-8-11.1.~~

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

(a) ***

(b) ***

~~The~~**Any such** application which shall be submitted by the Permittee does require the a
certification ~~by the~~**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) ***

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, ~~within~~ **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.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

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

(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. ~~This
limitation shall also make the requirements of 326 IAC 2-2 (Prevention of
Significant Deterioration) not applicable;~~

(2) ***

(3) ***

(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 (~~Prevention of Significant Deterioration (PSD)),~~ potential to
emit particulate matter (PM) from the entire source shall be limited to less than ~~two~~**one**
~~hundred fifty (250)~~**(100)** tons per twelve (12) consecutive month period.

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

(d) ***

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:

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator ~~or incinerate any waste or refuse~~ except as provided in 326 ~~IAC 4-2 and in 326 IAC 9-1-2.~~ **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.7 ~~Operation of Equipment [326 IAC 2-8-5(a)(4)]~~

~~Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.~~

C.87 Stack Height [326 IAC 1-7]

C.98 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(d) ***

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

(g) ~~Indiana Accredited~~**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 Accredited~~**Licensed** Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

C.940 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification ~~by 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 ~~by 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 ~~source~~ **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.

C.4011 Compliance Requirements [326 IAC 2-1.1-11]

C.4211 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

- (a) **For new units:**
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) **For existing units:**
Unless otherwise specified in this permit, ~~for all monitoring and record-keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and initiating any required monitoring operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to that the equipment- for an additional ninety (90) days provided the Permittee notifies:~~

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

C.13 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) ~~The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment.~~
- (b) ~~In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.~~
- (c) ~~Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup CEMS shall be brought online within four (4) hours of~~

~~shutdown of the primary CEMS, and shall be operated until such time as the primary CEMS is back in operation.~~

~~C.14 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]~~

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

**C.15 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).

~~C.1512 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. **The analog instrument shall be capable of measuring values outside of the normal range.**
- (b) ~~(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.

~~C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]~~

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

- ~~(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on January 22, 1998.~~
- ~~(b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]~~

~~C.1713 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 source Permittee must comply with the applicable requirements of 40 CFR 68.~~

~~C.1814 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]~~

- ~~(a) Upon detecting an excursion ~~or~~ 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 ~~and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions).~~ **Corrective actions. The response** may include, but ~~are~~**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 ~~within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.~~ **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 ~~maintain record the following records:~~
- (1) ~~monitoring data;~~
 - (2) ~~monitor performance data, if applicable; and~~
 - (3) ~~corrective actions~~ **reasonable response steps** taken.

C.4915 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall ~~take appropriate response actions. The Permittee shall submit a description of these its response actions to IDEM, OAQ, within thirty (30~~ **no later than seventy-five (75) days of receipt after the date of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.**
- (b) A retest to demonstrate compliance shall be performed ~~within~~ **no later than** one hundred ~~twenty (120~~ **eighty (180) days of receipt of after the original date of the test results.** Should the Permittee demonstrate to IDEM, OAQ that retesting in one -hundred ~~and twenty (120~~ **eighty (180) days** is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) ***

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

C.1620 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, where applicable:**

- (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.

Records of required monitoring information include the following, where applicable:

- (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.

(b) Unless otherwise specified in this permit, **for** all record keeping requirements not already legally required, **the Permittee** shall be implemented ~~with~~ **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.24-17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) ~~The source~~ **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 ~~with~~ **not later than** thirty (30) days ~~of~~ **after** the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include ~~the~~ a certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by ~~the~~ A an "authorized individual@" as defined by 326 IAC ~~2-1.1-1(1)~~ **(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 report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:~~

(b) The address for report submittal is:

(c) ***

- (d) **Reporting periods are based on calendar years**, unless otherwise specified in this permit, ~~all reports required in Section D. For the purpose of this permit shall be submitted within thirty (30) days of the end of "calendar year" means the reporting twelve (12) month period. All reports do require the certification by the Authorized individual@ as defined by 326 IAC 2- from January 1, 1-1(1). to December 31 inclusive.~~

~~(e) Reporting periods are based on calendar years.~~

C.1822 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 ~~the applicable~~ standards for recycling and emissions reduction:

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

Changes Specific to Section D and Forms of the Permit

- (a) Section D.1 has been updated to reflect the revised requirements for 326 IAC 6-3-2(d).
- (b) Section D.2 has been updated with new 326 IAC 2-8 (FESOP) limits and 326 IAC 2-2 (PSD) limits. It has also been updated to reflect the revised requirements for 326 IAC 6-3-2 and 326 IAC 6-2-4.
- (c) For clarity, IDEM, OAQ has changed references to the general conditions such as "in accordance with Section B", "in accordance with Section C", or other similar language to "Section C...contains the Permittee's obligation with regard to the records required by this condition.
- (d) The word "status" has been added to the Record Keeping Requirements and Reporting Requirements. The Permittee has the obligation to document the compliance status. The wording has been revised to properly reflect this.
- (e) IDEM, OAQ has revised the language in the parametric monitoring conditions and visible emission notations to clarify the Permittee responsibilities.
- (f) The phrase "of this permit" has been added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report to match the underlying rule.
- (g) IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.

SECTION D.1

FACILITY OPERATION CONDITIONS



Facility Description [326 IAC 2-8-4(10)]:

- (c) One (1) high-volume electrostatic powder ~~surface~~ coating self-contained booth, identified as P-B, equipped with eighteen (18) automatic powder spray guns and two (2) manual powder spray guns, with a maximum capacity of one hundred and twenty (120) pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (d) One (1) high-volume electrostatic powder ~~surface~~ coating self-contained booth, identified as P-C, equipped with eighteen (18) automatic powder spray guns and two (2) manual powder spray guns, with a maximum capacity of one hundred and twenty (120) pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building;
- (e) One (1) low-volume electrostatic powder ~~surface~~ coating booth, identified as P-3, equipped with two (2) manual powder spray guns, with a maximum capacity of spraying 14.2 pounds of powder per hour, utilizing a dry particulate filter for particulate control and exhausting through one (1) stack (S/V ID: NV3); and
- (f) One (1) ~~surface~~ powder coating self-contained booth, identified as P-4, consisting of two (2) high volume-low pressure (HVLP) spray guns with maximum capacity of 14.2 pounds of powder per hour, and using powder recovery equipment that utilizes vacuum filter array for particulate control and exhausting inside the building.

D.1.1 FESOP and PSD Limits [326 IAC 2-8-4] [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, PM, PM₁₀, and PM_{2.5} emissions from P-1, P-2, P-3, P-B, P-C and P-4 shall not exceed 1.0 lbs/hr, each.

Compliance with this limit, combined with the potential to emit of PM, PM₁₀, and PM_{2.5} from all other units at the source, shall limit the potential to emit of PM, PM₁₀, PM_{2.5} from the entire source to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (PSD) not applicable.

D.1.12 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the PM emission from each powder coating operation P-B and P-C shall each not exceed 0.62 pounds per hour when operating at a process weight flow rate of 120 pounds of powder per hour. This particulate limitation was calculated using the following equation:

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

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

- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate (PM) emission rate from each powder coating operation, P-1, P-2, P-3 and P-4, shall not exceed 0.551 pounds per hour when operating at a process weight flow rate of less than 100 pounds of powder per hour

- ~~(c) Pursuant to 326 IAC 6-3-2(d), the source shall operate the dry particulate filters for particulate emission control at powder booths (P-1 and P-3) and the powder recovery systems with their vacuum filter array for particulate emission control at powder booths (P-B, P-C, P-2 and P-4) in accordance with manufacturer's specifications.~~

D.1.23 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition. the powder coating booths (P-B, P-C, P-1, P-2, P-3 and P-4) and their baghouses and powder recovery equipment.~~

D.1.32 Particulate Control

In order to **ensure compliance** ~~comply~~ with condition D.1.1 and D.1.2, the dry particulate filters and the powder recovery equipment for particulate control shall be in operation and control emissions from the six (6) powder coating booths (P-B, P-C, P-1, P-2, P-3, P-4) at all times that the six (6) powder coating booths (P-B, P-C, P-1, P-2, P-3 and P-4) are in operation.

D.1.45 Visible Emissions Notations

- (a) ~~Once per day~~ Visible emission notations of the **dry particulate filters and vacuum filters associated with the** six (6) powder coating booths (P-B, P-C, P-1, P-2, P-3 and P-4) stack exhausts shall be performed **once per day** during normal daylight operations ~~when exhausting to the atmosphere~~. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) **If abnormal emissions are observed, the Permittee shall take a reasonable response.** ~~The Response to Excursions or Exceedances for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps** ~~Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.~~

D.1.56 Patametric Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry vacuum filters, and dry ~~particulate filters~~ **filters**, weekly observations shall be made of the overspray from the powder coating booths ~~(P-1, P-2, P-3, P-4, P-B and P-C)~~ **stacks** while one or more of the booths are in operation. **if a condition exists which should result in a response step, the Permittee shall take a reasonable response.** ~~The Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances~~ **contains the Permittee's obligation with regard to the**

reasonable response steps required by this condition. Failure to take response steps Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. **When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response.** ~~The Response to Excursions or Exceedances for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances~~ Preparation, Implementation, Records, and Reports, **contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps** shall be considered a deviation from this permit.
- (c) ~~Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] ~~[326 IAC 2-8-16]~~

D.1.67 Record Keeping Requirements

- (a) To document **the compliance status** with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the stack exhaust once per shift. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (b) To document **the compliance status** with Condition D.1.5, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.
- (c) To document **the compliance status** with Condition D.1.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit~~ **contains the Permittee's obligation with regard to the records required by the condition.**

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description ~~[326 IAC 2-8-4(10)]~~:

The following are insignificant activities, as defined in ~~326 IAC 2-7-1(21)~~:

- (b) Fuel oil-fired combustion sources with heat input equal to or less than two million Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.

(1) one (1) waste-oil fired heater rated at 0.225 MMBtu/hr.

- (c) ~~Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding~~

HAPs:	

(e)	Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
(f)	Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
(g)	***
(4)	one (1) wheel grinder; utilizing a baghouse (BH6) for particulate control;
(5)	three (3) fully enclosed sand blasting cabinet, identified as SB2 fully self contained;
(46)	Two (2) seventeen (17) six-inch belt sanders utilizing a baghouse (BH5) for particulate control;
(7)	Three (3) one (1) inert gas laser cutter utilizing a baghouse (BH6) for particulate control; and
(5)	Two (2) inert gas laser cutter, identified as LVD3020 and LVD4020, utilizing a baghouses, identified as Torit-LASR003C, for particulate control
(6)	One (1) inert gas laser cutter, identified as Cincinnati Laser Cutter, utilizing a baghouses, identified as Amtech-AT-4, for particulate control
(78)	***

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

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, PM, PM10, and PM2.5 emissions from the following units shall not exceed the emission limits below:

Unit Description	PM/PM10/PM2.5 Emission Limit (lb/hr)
SB1	2.5
SB2	2.5
LVD 3020 and LVD 4020	2.5
Cincinnati Laser Cutter	2.5

Compliance with this limit, combined with the potential to emit of PM, PM10, and PM2.5 from all other units at the source, shall limit the potential to emit of PM, PM10, PM2.5 from the entire source to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (PSD) not applicable.

D.2.42 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, particulate emissions from each of following operations shall not exceed the pound per hour limit listed in the table below:

Unit Description	Control Device ID	Max. Throughput Rate (tons/hr)	Particulate Emission Limit (lb/hr)
SB1	BH7	0.177	1.29
SB2	-	0.177	1.29
LVD 3020 and LVD 4020	Torit- LASR003C	0.125	1.02
Cincinnati Laser Cutter	Amtech-AT-4	0.125	1.02

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), The allowable particulate emission rate from the shotblaster (SB1 and SB2) shall not exceed 1.28 pounds per hour when operating at a process weight rate of 354 pounds abrasive per hour.

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

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

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

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate (PM) emission rate from the seventeen (17) belt sanders shall be limited according to the following equation:

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

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

(c) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the portable grinder controlled by one (1) baghouse, identified as BH6 shall not exceed 1.02 pounds per hour when operating at a process weight rate of 250 pounds of raw materials per hour.

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

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

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

D.2.3 Particulate Emissions Limitation [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

Emission Unit	Number of Natural Gas-fired Units	Pt (lb/MMBtu)
Air makeup	1	0.428
Process Water Heater	2	0.428

Emission Unit	Number of Natural Gas-fired Units	Pt (lb/MMBtu)
Pretreatment Dry-off Oven	1	0.428
Area Heaters	4	0.428
Carries Burn-off Oven	1	0.428
Infrared Hanging Heaters	16	0.428
Cure Ovens	3	0.428
Dry off Ovens	1	0.428
HV Cure Oven	1	0.428
HVAC	1	0.428
Waste-oil fired heater	1	0.428

D.2.24 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for **these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.** the baghouses (BH5 and BH7). A Preventive Maintenance Plan is not required for the portable dual grinder controlled by baghouse, identified as BH6.

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

D.2.35 Particulate Control

In order to **ensure compliance** with condition D.2.1, the baghouses (**Torit-LASR003C, Amtech-AT-4 and BH7** ~~BH5, BH6 and BH7~~) for particulate control shall be in operation and control emissions from the shotblasters (**SB1) and laser cutters (LVD 3020, LVD 4020, Cincinnati Laser Cutter)** and ~~SB2), machining, welding and grinding units~~ at all times that the shotblasters (**SB1) and laser cutters (LVD 3020, LVD 4020, Cincinnati Laser Cutter)** and ~~SB2), machining, welding and grinding units~~ are in operation.

D.2.6 Visible Emissions Notations

- (a) **Visible emission notations of baghouses Torit-LASR003C, Amtech-AT-4 and BH7 stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.**
- (b) **For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.**
- (c) **In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.**
- (d) **A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.**
- (e) **If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.**

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

D.2.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the stack exhaust once per shift. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).
- (b) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligation with regard to the records required by the condition.

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

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. ~~Deviations that are~~ **A deviation** required to be reported ~~by~~ **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~~ **does** not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

Page 2 of 2

Form Completed by:
Title/Position:
Date:
Phone:

~~Attach a signed certification to complete this report.~~

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

Conclusion

The operation of this surface coating operation shall be subject to the conditions of the attached FESOP Renewal No. F151-34115-00042.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Julie Alexander at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-1782 or toll free at 1-800-451-6027 extension 3-1782.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

Appendix A: Emissions Calculations

Company Name: Koester Metals, Inc
Address City IN Zip: 301 West Water Street, Fremont, IN 46737
Permit Number: F151-34115-00042
Permit Reviewer: Julie Alexander
Date: May 16, 2014

Uncontrolled Potential to Emit (tons/yr)									
Emission Unit	PM	PM10	PM2.5 *	SO2	Nox	VOC	CO	CO2e	Total HAPs
Powder Surface Coating	207.87	207.87	207.87	-	-	-	-	-	-
SB1	44.97	31.48	31.48	-	-	-	-	-	-
SB2	134.90	94.43	94.43	-	-	-	-	-	-
Natural Gas Combustion	0.30	1.18	1.18	0.09	15.58	0.86	13.09	18,804	0.29
Fuel Oil-fired Combustion	1.41E-02	1.68E-02	1.50E-02	5.00E-01	1.41E-01	2.39E-03	3.52E-02	152	4.83E-05
Welding	5.78	5.78	5.78	-	-	-	-	-	5.26E-01
Machining, Grinding etc.	792.20	792.20	792.20	-	-	-	-	-	-
Part Washers	-	-	-	-	-	0.97	-	-	1.94E-03
G-1 & G-2	-	-	-	-	-	-	-	-	2.00
Total	1186.03	1132.96	1132.96	0.59	15.72	1.83	13.12	18,956	2.82

* PM2.5 listed is direct PM2.5

Potential to Emit after Control (tons/yr)									
Emission Unit	PM	PM10	PM2.5 *	SO2	Nox	VOC	CO	CO2e	Total HAPs
Powder Surface Coating	4.16	4.16	4.16	-	-	-	-	-	-
SB1	0.22	0.16	0.16	-	-	-	-	-	-
SB2	0.67	0.47	0.47	-	-	-	-	-	-
Natural Gas Combustion	0.30	1.18	1.18	0.09	15.58	0.86	13.09	18,804	0.29
Fuel Oil-fired Combustion	1.41E-02	1.68E-02	1.50E-02	0.50	0.14	2.39E-03	3.52E-02	152	4.83E-05
Welding	5.78	5.78	5.78	-	-	-	-	-	5.26E-01
Machining, Grinding etc.	7.75	7.75	7.75	-	-	-	-	-	-
Part Washers	-	-	-	-	-	0.97	-	-	0.00
G-1 & G-2	-	-	-	-	-	-	-	-	2.00
Total	18.89	19.51	19.51	0.59	15.72	1.83	13.12	18,956	2.82

* PM2.5 listed is direct PM2.5

Potential to Emit after Issuance (tons/yr)									
Emission Unit	PM	PM10	PM2.5 *	SO2	Nox	VOC	CO	CO2e	Total HAPs
Powder Surface Coating	26.28	26.28	26.28	-	-	-	-	-	-
SB1	10.95	10.95	10.95	-	-	-	-	-	-
SB2	10.95	10.95	10.95	-	-	-	-	-	-
Natural Gas Combustion	0.30	1.18	1.18	0.09	15.58	0.86	13.09	18,804	0.29
Fuel Oil-fired Combustion	0.01	0.02	0.01	0.50	0.14	2.39E-03	3.52E-02	152	4.83E-05
Welding	5.78	5.78	5.78	-	-	-	-	-	0.53
Machining, Grinding etc.	25.70	25.70	25.70	-	-	-	-	-	-
Part Washers	-	-	-	-	-	0.97	-	-	0.00
G-1 & G-2	-	-	-	-	-	-	-	-	2.00
Total	79.97	80.87	80.86	0.59	15.72	1.83	13.12	18,956	2.82

* PM2.5 listed is direct PM2.5

Note: The shaded cells indicate where limits are included.

Appendix A: Emissions Calculations

Company Name: Koester Metals, Inc
Address City IN Zip: 301 West Water Street, Fremont, IN 46737
Permit Number: F151-34115-00042
Permit Reviewer: Julie Alexander
Date: May 16, 2014

Facility	Maximum Usage (lbs/hr)	Transfer Efficiency	Uncontrolled Particulate PTE		Control device	Control Efficiency	Controlled Particulate PTE		Limited Particulate PTE	
			(lbs/hr)	(ton/yr)			(lbs/hr)	(ton/yr)	(lbs/hr)	(ton/yr)
P-1	24	85%	3.60	15.77	Dry particulate filter	98%	0.07	0.32	1.00	4.38
P-2	24	85%	3.60	15.77	Vacuum Filter	98%	0.07	0.32	1.00	4.38
P-3	14.2	85%	2.13	9.33	Dry particulate filter	98%	0.04	0.19	1.00	4.38
P-B	120	85%	18.00	78.84	Vacuum Filter	98%	0.36	1.58	1.00	4.38
P-C	120	85%	18.00	78.84	Vacuum Filter	98%	0.36	1.58	1.00	4.38
P-4	14.2	85%	2.13	9.33	Vacuum Filter	98%	0.04	0.19	1.00	4.38
Total			47.46	207.87			0.95	4.16	6.00	26.28

Notes:

Uncontrolled Particulate Potential (lbs/hr) = Maximum Usage per hour (lbs/hour) * (1-Transfer efficiency)

Controlled Particulate Potential (lbs/hr) = Uncontrolled Particulate Potential (lbs/hr) * (1-Control Efficiency)

Controlled Potential Emission for particulate calculated using 98% control efficiency for all the equipment.

Appendix A: Emissions Calculations

Company Name: Koester Metals, Inc
Address City IN Zip: 301 West Water Street, Fremont, IN 46737
Permit Number: F151-34115-00042
Permit Reviewer: Julie Alexander
Date: May 16, 2014

Welding Emissions

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 = PM2.5	Mn	PM = PM10 = PM2.5	Mn	
Metal Inert Gas (MIG)(carbon steel)	17.00	10.00	0.01	0.00	0.94	0.09	0.09
Tungsten Inert Gas (TIG)(carbon steel)	14.00	5.00	0.01	0.00	0.39	0.04	0.04
EMISSION TOTALS							
Potential Emissions lbs/hr					1.32	0.12	0.12
Potential Emissions lbs/day					31.68	2.88	2.88
Potential Emissions tons/year					5.78	0.53	0.53

Grinding Emissions

Process Description	Control Device	Outlet Grain Loading grains/dscf	Maximum Air Flow Rate dscfm	Uncontrolled PTE		Control Efficiency %	Controlled PTE		Limited PTE	
				PM/PM ₁₀ /PM _{2.5}			PM/PM ₁₀ /PM _{2.5}		PM/PM ₁₀ /PM _{2.5}	
				lbs/hr	TPY	lbs/hr	TPY	lbs/hr	TPY	
Laser Cutter LVD 3020 and LVD 4020	Torit- LASR003C	0.03	1750.00	90.00	394.20	1.00	0.45	1.97	2.50	10.95
Cincinnati Laser Cutter	Amtech-AT-4	0.03	1750.00	90.00	394.20	1.00	0.45	1.97	2.50	10.95
Total				180.00	788.40	-	0.90	3.94	5.00	21.90

Sanding Emissions

A mass lost method was used to determine the emission from the belt sanders. A part was weighted before and after sanding. The difference is the PM emissions.

Start weight	4.258	lbs/part
End Weight	4.25	lbs/part
Number of sanders	2	sanders
Number of parts	40	parts/hr
PM/PM10/PM2.5 emissions	0.32	lbs/hr
	2803.20	lbs/yr
	1.40	tons/yr
	2.80	tons/yr for both sanders

Total Emissions form Machining, Grinding etc.

Uncontrolled PTE	PM	PM10	PM2.5
Grinding Emissions	788.40	788.40	788.40
Sanding Emissions	2.80	2.80	2.80
Miscellaneous Activities ¹	1.00	1.00	1.00
Total Emissions	792.20	792.20	792.20

Controlled PTE	PM	PM10	PM2.5
Grinding Emissions	3.94	3.94	3.94
Sanding Emissions	2.80	2.80	2.80
Miscellaneous Activities ¹	1.00	1.00	1.00
Total Emissions	7.75	7.75	7.75

Limited PTE	PM	PM10	PM2.5
Grinding Emissions	21.90	21.90	21.90
Sanding Emissions	2.80	2.80	2.80
Miscellaneous Activities ¹	1.00	1.00	1.00
Total Emissions	25.70	25.70	25.70

Methodology:

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

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

1) In order to be conservative, 1 ton/year of PM/PM10/PM2.5 has been included to cover any miscellaneous activities. This includes the fifteen 110 volt electric hand grinders and hand polishers.

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.

Conversion Factors: 7000 grains/pound; 60 minutes/hour; 8,760 hours/year; 2,000 pounds/ton

PTE of PM/PM₁₀ after Control (lbs/hr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 mins/hr x 1/7000 lb/gr

PTE of PM/PM₁₀ after Control (tons/yr) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 mins/hr x 1/7000 lb/gr x 8760 hr/yr x 1 ton/2000 lbs

PTE of PM/PM₁₀ before Control (tons/yr) = PTE of PM/PM₁₀ after Control (tons/yr) / (1-Control Efficiency)

Appendix A: Emissions Calculations

Company Name: Koester Metals, Inc
Address City IN Zip: 301 West Water Street, Fremont, IN 46737
Permit Number: F151-34115-00042
Permit Reviewer: Julie Alexander
Date: May 16, 2014

Unit	Number of Units	Total MMBtu/hr	HHV mmBtu	Potential Throughput MMCF/yr
Air makeup	1	5.39		
Process Water Heater	1	0.94		
Process Water Heater	1	0.79		
Pretreatment Dry-off Oven	1	0.40		
Area Jeaters	4	1.60		
Carries Burn-off Oven	1	0.30		
Infrared Hanging Heaters	16	15.36		
Cure Ovens	2	3.30		
Dry off Ovens	1	1.65		
HV Cure Oven	1	3.1		
Cure Ovens	1	3		
HVAC	1	0.45		
Total Heat Input Capacity		36.3	1020	311.6

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	0.3	1.2	1.2	0.1	15.6	0.9	13.1

*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	Total - Organics
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	3.271E-04	1.869E-04	1.168E-02	2.804E-01	5.296E-04	2.931E-01

Emission Factor in lb/MMcf	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	7.789E-05	1.714E-04	2.181E-04	5.920E-05	3.271E-04	8.537E-04
						Total HAPs
						2.940E-01
						Worst HAP
						2.804E-01

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	18,693	0.4	0.3
Summed Potential Emissions in tons/yr	18,694		
CO2e Total in tons/yr based on 11/29/2013 federal GWPs	18,804		

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/1,020 MMBtu

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

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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.

Global 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) based on 11/29/2013 federal GWPs= CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) +

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#1 and #2 Fuel Oil

Company Name: Koester Metals, Inc
Address City IN Zip: 301 West Water Street, Fremont, IN 46737
Permit Number: F151-34115-00042
Permit Reviewer: Julie Alexander
Date: May 16, 2014

Heat Input Capacity MMBtu/hr **0.225**
 Potential Throughput kgals/year 14.08
 S = Weight % Sulfur **0.5**

	Pollutant						
Emission Factor in lb/kgal	PM* 2.0	PM10 2.4	direct PM2.5 2.1	SO2 71 (142.0S)	NOx 20.0	VOC 0.34	CO 5.0
Potential Emission in tons/yr	1.41E-02	1.68E-02	1.50E-02	5.00E-01	1.41E-01	2.39E-03	3.52E-02

	HAPs - Metals				
Emission Factor in lb/mmBtu	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential Emission in tons/yr	3.94E-06	2.96E-06	2.96E-06	2.96E-06	8.87E-06

	HAPs - Metals (continued)			
Emission Factor in lb/mmBtu	Mercury 3.0E-06	Manganese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential Emission in tons/yr	2.96E-06	5.91E-06	2.96E-06	1.48E-05
	Total HAPs			4.83E-05
	Worst Case HAP			1.48E-05

	Greenhouse Gas		
Emission Factor in lb/kgal	CO2 21,500	CH4 0.216	N2O 0.26
Potential Emission in tons/yr	151	0.0	0.0
Summed Potential Emissions in tons/yr	151		
CO2e Total in tons/yr based on 11/29/2013 federal GWPs	152		

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu
 Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu
 Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)
 *PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.
 Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton
 No data was available in AP-42 for organic HAPs.
 Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton
 The CO2 Emission Factor for #1 Fuel Oil is 21500. The CO2 Emission Factor for #2 Fuel Oil is 22300.
 Emission Factors are from AP 42, Tables 1.3-3, 1.3-8, and 1.3-12 (SCC 1-03-005-01/02/03) Supplement E 9/99 (see erata file)
 Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.
 Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton
 CO2e (tons/yr) based on 11/29/2013 federal GWPs= CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).

Appendix A: Emissions Calculations

Company Name: Koester Metals, Inc
 Address City IN Zip: 301 West Water Street, Fremont, IN 46737
 Permit Number: F151-34115-00042
 Permit Reviewer: Julie Alexander
 Date: May 16, 2014

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

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

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

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

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

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

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

D = Density of abrasive (lb/ft3) From Table 2 =

D1 = Density of sand (lb/ft3) =

ID = Actual nozzle internal diameter (in) =

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

Flow Rate (FR) (lb/hr) =

354
99
99
0.3125
0.3125

354.000 per nozzle

Uncontrolled Emissions (E, lb/hr)

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

EF = emission factor (lb PM10 / lb PM) From Table 1 =

FR = Flow Rate (lb/hr) =

w = fraction of time of wet blasting =

N = number of nozzles =

0.029
0.700
354.000
0%
1

Uncontrolled Emissions PM =	10.27 lb/hr
	44.97 ton/yr
Uncontrolled Emissions PM10/PM2.5=	7.19 lb/hr
	31.48 ton/yr
Controlled Emissions PM =	0.05 lb/hr
	0.22 ton/yr
Controlled Emissions PM10/PM2.5=	0.04 lb/hr
	0.16 ton/yr

METHODOLOGY

SB1 is controlled by baghouse BH7 which has a 99.5% collection efficiency.

SB2 is not controlled by a baghouse but fully self-contained with a controlled efficiency of 99.5% is assumed.

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

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

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

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

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

Appendix A: Emissions Calculations

Company Name: Koester Metals, Inc
 Address City IN Zip: 301 West Water Street, Fremont, IN 46737
 Permit Number: F151-34115-00042
 Permit Reviewer: Julie Alexander
 Date: May 16, 2014

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

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

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

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

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

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

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

D = Density of abrasive (lb/ft3) From Table 2 =

D1 = Density of sand (lb/ft3) =

ID = Actual nozzle internal diameter (in) =

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

Flow Rate (FR) (lb/hr) =

354
99
99
0.3125
0.3125

354.000 per nozzle

Uncontrolled Emissions (E, lb/hr)

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

EF = emission factor (lb PM10 / lb PM) From Table 1 =

FR = Flow Rate (lb/hr) =

w = fraction of time of wet blasting =

N = number of nozzles =

0.029
0.700
354.000
0%
3

Uncontrolled Emissions PM =	30.80 lb/hr
	134.90 ton/yr
Uncontrolled Emissions PM10/PM2.5=	21.56 lb/hr
	94.43 ton/yr

Controlled Emissions PM =	0.15 lb/hr
	0.67 ton/yr
Controlled Emissions PM10/PM2.5=	0.11 lb/hr
	0.47 ton/yr

METHODOLOGY

SB1 is controlled by baghouse BH7 which has a 99.5% collection efficiency.

SB2 is not controlled by a baghouse but fully self-contained with a controlled efficiency of 99.5% is assumed.

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

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

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

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

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

**Appendix A: Emissions Calculations
Insignificant Degreaser**

Company Name: Koester Metals, Inc
Address City IN Zip: 301 West Water Street, Fremont, IN 46737
Permit Number: F151-34115-00042
Permit Reviewer: Julie Alexander
Date: May 16, 2014

In order for the degreaser to qualify as an insignificant activity under the listing in 326 IAC 2-7-1(21)(J)(vi)(DD), the source shall use solvents "the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months".

Based on a review of the solvents most widely supplied for the industry by Crystal Clean and Safety-Kleen, the following PTE is based on the following conservative estimates:

The solvent has a maximum density of 6.7 lb/gal.

The solvent used in the degreaser contains 100% VOC and up to 0.2% HAP (tetrachloroethylene).

Number of degreasers 2

Utilized MSDS for Safety-Kleen 105 Recycled Solvent as worse case HAP content: <http://www.safety-kleen.com/msds/82310rev8-21-09.pdf>

Uncontrolled Potential Emissions (per each degreaser)

6.7	lb/gal x	100	% VOC x	145	gal/yr ÷	2000	lb/ton =	0.97	tons VOC per year
				0.97	tpy VOC x	0.2	% HAP =	0.002	tons HAP per year



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Clayton Brink
Koester Metals, Inc.
PO Box 617
Fremont, Indiana 46737

DATE: August 13, 2014

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

SUBJECT: Final Decision
FESOP – Renewal
151-34115-00042

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 6/13/2013



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

August 13, 2014

TO: Fremont Public Library

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

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

Applicant Name: Koester Metals, Inc.
Permit Number: 151-34115-00042

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 6/13/2013

Mail Code 61-53

IDEM Staff	AWELLS 8/13/2014 Koester Metals, Inc 151-34115-00042 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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3		Steuben County Health Department 317 S. Wayne St, Community Center Suite 3-A Angola IN 46703-1938 (Health Department)									
4		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 (Affected Party)									
5		Fremont Public Library 2145 E North St, P.O. Box 7 Fremont IN 46737-0007 (Library)									
6		Fremont Town Council PO Box 10, 204 N. Coffin Street Fremont IN 47432 (Local Official)									
7		Mr. Diane Hanson 490 E 300 N Angola IN 46703 (Affected Party)									
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