



# 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](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

To: Interested Parties

Date: May 27, 2014

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

Source Name: ATK Armament Systems Commercial Products - Champion

Permit Level: Minor Source Operating Permit (MSOP) Administrative Amendment

Permit Number: 177-34418-00118

Source Location: 232 Industrial Parkway, Richmond, Indiana

Type of Action Taken: Changes that are administrative in nature

## Notice of Decision: Approval

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. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

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 34418.

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

*(continues on next page)*

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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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Michael R. Pence  
Governor

Thomas W. Easterly  
Commissioner

Tim Emmenegger  
ATK Armament Systems Commercial Products - Champion  
P.O. Box 1151  
Richmond, IN, 47375

May 27, 2014

Re: 177-34418-00118  
Administrative Amendment to  
MSOP M177-33102-00118

Dear Mr. Emmenegger:

ATK Armament Systems Commercial Products - Champion was issued a MSOP No.: M177-33102-00118 on September 4, 2013, for a stationary clay target manufacturing operation located at 232 Industrial Parkway, Richmond, Indiana. On April 10, 2014, the Office of Air Quality (OAQ) received an application from the source requesting to make corrections to the emission unit descriptions and associated permit conditions.

Pursuant to 326 IAC 2-6.1-6(d)(2)(A), this change to the permit is considered an administrative amendment because the permit is amended to change the descriptive information concerning the source or emissions unit(s), where the revision will not trigger a new applicable requirement.

### Proposed Changes:

Pursuant to the provisions of 326 IAC 2-6.1-6, the permit is hereby amended as follows with the deleted language as ~~strikeouts~~ and new language **bolded**.

**Amendment No.1:** The control devices for the storage silos were incorrectly identified as utilizing negative pressure to control particulates. These units do not have a fan attached to create a specified flow rate. Rather, these units use positive pressure, and are considered to be passive control devices. Therefore, the emission unit descriptions in sections A.2, D.1, and D.2 of the permit have been amended as follows:

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

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

- (a) Two (2) calcium carbonate storage silos, identified as S-1 and S-2, constructed in 1994 and 1998, respectively, with a combined storage capacity of 6,600 cubic feet and with a maximum throughput of 11,250 tons per year with product conveyed to the mixer via auger; equipped with a **two (2) passive (positive pressure) baghouses** identified as **BG-1 and BG-2** for control of particulate emissions, ~~with an airflow rate of 3,500 cfm and an outlet grain loading of 0.01 grains/dscf,~~ exhausting to stacks **V-1 and V-2**;
- (b) One (1) flaked pitch storage silo, identified as S-3, constructed in 1994, with a storage capacity of 2,200 cubic feet, with product conveyed to the mixer via auger, equipped with a **passive (positive pressure) baghouse** identified as **BG-23** for control of particulate emissions, ~~with an airflow rate of 3,500 cfm and an outlet grain loading of 0.01 grains/dscf,~~ exhausting to stack **V-23**;

\*\*\*

- (d) Three (3) target production lines consisting of the following:
  - (1) Three (3) paint booths, identified as Paint Booth 1, constructed in 1976, Paint Booth 2, constructed in 1976 and Paint Booth 3, approved in 2013 for construction, each with a



A State that Works

maximum capacity of 118,053 units per day, each equipped with four (4) air atomized spray guns, each using ~~dry polyester filters for particulate control and subsequently~~ **connected via common ductwork and** exhausting to a baghouse, identified as BG-34 for ~~additional control of particulate emissions, with an airflow rate of 2,500 cfm and an outlet grain loading of 0.01 grains/dscf, exhausting to stack V-34;~~

\*\*\*

#### SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

##### Emissions Unit Description:

- (d) Three (3) target production lines consisting of the following:
  - (1) Three (3) paint booths, identified as Paint Booth 1, constructed in 1976, Paint Booth 2, constructed in 1976 and Paint Booth 3, approved in 2013 for construction, each with a maximum capacity of 118,053 units per day, each equipped with four (4) air atomized spray guns, each using ~~dry polyester filters for particulate control and subsequently~~ **connected via common ductwork and** exhausting to a baghouse, identified as BG-34 for ~~additional control of particulate emissions, with an airflow rate of 2,500 cfm and an outlet grain loading of 0.01 grains/dscf, exhausting to stack V-34;~~

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

#### SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

##### Emissions Unit Description:

- (a) Two (2) calcium carbonate storage silos, identified as S-1 and S-2, constructed in 1994 and 1998, respectively, with a combined storage capacity of 6,600 cubic feet and with a maximum throughput of 11,250 tons per year with product conveyed to the mixer via auger, equipped with **a two (2) passive (positive pressure) baghouses** identified as BG-1 and BG-2 for control of particulate emissions, with ~~an airflow rate of 3,500 cfm and an outlet grain loading of 0.01 grains/dscf, exhausting to stacks V-1 and V-2;~~
- (b) One (1) flaked pitch storage silo, identified as S-3, constructed in 1994, with a storage capacity of 2,200 cubic feet, with product conveyed to the mixer via auger, equipped with a **passive (positive pressure) baghouse** identified as BG-23 for control of particulate emissions, with ~~an airflow rate of 3,500 cfm and an outlet grain loading of 0.01 grains/dscf, exhausting to stack V-23;~~

\*\*\*

- (d) Three (3) target production lines consisting of the following:
  - (1) Three (3) paint booths, identified as Paint Booth 1, constructed in 1976, Paint Booth 2, constructed in 1976 and Paint Booth 3, approved in 2013 for construction, each with a maximum capacity of 118,053 units per day, each equipped with four (4) air atomized spray guns, each using ~~dry polyester filters for particulate control and subsequently~~ **connected via common ductwork and** exhausting to a baghouse, identified as BG-34 for ~~additional control of particulate emissions, with an airflow rate of 2,500 cfm and an outlet grain loading of 0.01 grains/dscf, exhausting to stack V-34;~~

\*\*\*

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

**Amendment No.2:** The compliance monitoring requirements in Condition D.1.4 have been removed from the permit. These requirements are duplicative of Condition D.1.1, and are not appropriate for a MSOP. Therefore, Conditions D.1.4 and D.1.5 have been amended as follows:

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

\*\*\*

**Compliance Monitoring Requirements**

**D.1.4 Monitoring**

- (a) ~~Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters controlling emissions from the surface coating booths (Paint Booths 1, 2 and 3). To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks while the one or more of the respective booths are in operation. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.~~
- (b) ~~Monthly inspections shall be performed of the coating emissions from the stacks and for the presence of overspray on the rooftops and the nearby ground. 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.~~

~~These monitoring conditions are necessary because the dry filters for the surface coating operations must operate properly to ensure compliance with 326 IAC 6-3-2(d) and 326 IAC 2-6.1 (MSOP).~~

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

**D.1.54 Record Keeping Requirements**

- (a) To document the compliance status with Conditions D.1.1, ~~D.1.3,~~ and D.1.4, the Permittee shall comply with the following:
  - (1) ~~The Permittee shall maintain a log of weekly overspray observations and monthly inspections.~~
  - (2) ~~The Permittee shall maintain a log of daily inspections. The Permittee shall include in its daily log when an inspection was not performed and the reason for the lack of an inspection (e.g. the process did not operate that day).~~
- (1) **To document the compliance status with condition D.1.1, the Permittee shall maintain a record of any actions taken if overspray is visibly detected.**
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

**Amendment No.3:** In accordance with the emission unit description changes, the following conditions in section D.2 of the permit have been amended as follows:

**Compliance Determination Requirements**

**D.2.3 Particulate Control**

- (a) In order to comply with the requirements of Condition D.2.1, the baghouses (BG-1, and BG-2, **and BG-3**) for particulate control shall be in operation and control emissions from the two (2) limestone (calcium carbonate) storage silos, identified as S-1 and S-2, and the

one (1) flaked pitch storage silo, identified as S-3 at all times that the dry material storage silos are in operation.

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

**D.2.4 Visible Emission Notations**

\*\*\*

- (e) If abnormal emissions are observed from Stacks (V-1, and V-2, and V-3), the Permittee shall take 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.

**Amendment No.4:** In accordance with Amendment No.1, the calculations for the control devices for the storage silos have been updated to represent the fact that these units do not utilize negative pressure to control particulates. These units do not have a fan attached to create a specified flow rate. Rather, these units use positive pressure, and are considered to be passive control devices. The updated calculations for these units and the entire source are attached to this letter as Appendix A.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire MSOP as amended.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

If you have any questions on this matter, please contact Angela Taylor of my staff, at 317-234-5329 or 1-800-451-6027, and ask for extension 4-5329.

Sincerely,



Chrystal A. Wagner,  
Section Chief  
Permits Branch  
Office of Air Quality

Attachment(s): Updated Permit

CAW/APT

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

**Appendix A: Emission Calculations  
Emissions Summary**

**Company Name:** ATK Armament Systems Commercial Products - Champion  
**Address City IN Zip:** 232 Industrial Pkwy, Richmond, IN 47374  
**SIC Code:** 3949  
**Permit Number:** M177-33102-00118  
**Permit Issuance:** 09/04/13  
**Administrative Amendment No.:** 177-34418-00118  
**Reviewer:** APT  
**Date:** April 24, 2013

Unlimited Potential to Emit (PTE) (tons/year) (Before Controls)											
Emission Units	PM	PM10	PM2.5	SOx	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP	
Natural Gas Combustion	0.01	0.03	0.03	0.00	0.37	0.02	0.31	443	0.01	0.01	hexane
*Material Storage / Transfer	3.67	0.59	0.22	-	-	-	-	-	< 2	< 1	Benzo(a)pyrene
Mixing and Process	6.19	0.90	0.34	-	-	-	-	-	-	-	-
Pitch Tanks	-	-	-	-	-	0.00	-	-	-	-	-
Spray Booths	37.34	37.34	37.34	-	-	0.99	-	-	0.66	0.66	Formaldehyde
Paved Roads	1.00	0.20	0.05	-	-	-	-	-	-	-	-
<b>Total Uncontrolled PTE</b>	<b>48.20</b>	<b>39.06</b>	<b>37.98</b>	<b>0.00</b>	<b>0.37</b>	<b>1.01</b>	<b>0.31</b>	<b>443.26</b>	<b>2.67</b>	<b>0.66</b>	<b>Formaldehyde</b>

\* Potential HAP emissions conservatively estimated

Unlimited Potential to Emit (PTE) (tons/year) (After Controls)											
Emission Units	PM	PM10	PM2.5	SOx	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP	
Natural Gas Combustion	0.01	0.03	0.03	0.00	0.37	0.02	0.31	443.26	0.01	0.01	hexane
*Material Storage / Transfer	0.07	0.01	0.00	-	-	-	-	-	< 2	< 1	Benzo(a)pyrene
Mixing and Process	0.06	0.01	0.00	-	-	-	-	-	-	-	-
Pitch Tanks	-	-	-	-	-	0.00	-	-	-	-	-
Spray Booths	0.37	0.37	0.37	-	-	0.99	-	-	-	0.66	Formaldehyde
Paved Roads	0.91	0.18	0.04	-	-	-	-	-	-	-	-
<b>Total Controlled PTE</b>	<b>1.42</b>	<b>0.60</b>	<b>0.45</b>	<b>0.00</b>	<b>0.37</b>	<b>1.01</b>	<b>0.31</b>	<b>443.26</b>	<b>2.67</b>	<b>0.66</b>	<b>Formaldehyde</b>

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

**Company Name:** ATK Armament Systems Commercial Products - Champion  
**Address City IN Zip:** 232 Industrial Pkwy, Richmond, IN 47374  
**SIC Code:** 3949  
**Permit Number:** M177-33102-00118  
**Permit Issuance:** 09/04/13  
**Administrative Amendment No.:** 177-34418-00118  
**Reviewer:** APT  
**Date:** April 24, 2013

Process	Throughput Rate (tons/year)	Emission factors (lb/ton)			Potential Emissions before Controls (tons / year)			Control Efficiency (%)	PTE after Controls (tons / year)		
		PM	PM <sub>10</sub>	PM <sub>2.5</sub>	PM	PM <sub>10</sub>	PM <sub>2.5</sub>		PM	PM <sub>10</sub>	PM <sub>2.5</sub>
S-1	11250	0.0099	0.0016	0.0006	2.784375	0.45	0.16875	98%	0.0556875	0.009	0.00338
S-2		0.0099	0.0016	0.0006				98%			
S-3	3575	0.0099	0.0016	0.0006	0.8848125	0.143	0.053625	98%	0.0176963	0.00286	0.00107
<b>Total</b>					<b>3.67</b>	<b>0.59</b>	<b>0.22</b>		<b>0.073</b>	<b>0.012</b>	<b>0.004</b>

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

**Methodology:**

PTE After Controls (tons/yr) = Throughput rate (tons/year)\*EF (lb/ton)\*(1 ton/2000lb)

PTE Before Controls (tons/yr) = PTE after controls (tons/yr) / (1 - control efficiency)



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Michael R. Pence  
Governor

Thomas W. Easterly  
Commissioner

## New Source Construction and Minor Source Operating Permit OFFICE OF AIR QUALITY

### ATK Armament Systems Commercial Products - Champion 232 Industrial Parkway Richmond, Indiana 47374

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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

Operation Permit No.: M177-33102-00118	
Issued by: Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 4, 2013 Expiration Date: September 4, 2018

First Administrative Amendment No.: 177-34418-00118	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 27, 2014 Expiration Date: September 4, 2018

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**Compliance Determination Requirements**

- D.1.3 Particulate

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**Compliance Determination Requirements**

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary clay target manufacturing operation.

Source Address:	232 Industrial Parkway, Richmond, Indiana 47374
General Source Phone Number:	765-966-7745
SIC Code:	3949
County Location:	Wayne
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

---

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

- (a) Two (2) calcium carbonate storage silos, identified as S-1 and S-2, constructed in 1994 and 1998, respectively, with a combined storage capacity of 6,600 cubic feet and with a maximum throughput of 11,250 tons per year with product conveyed to the mixer via auger; equipped with a two (2) passive (positive pressure) baghouses identified as BG-1 and BG-2 for control of particulate emissions, exhausting to stacks V-1 and V-2;
- (b) One (1) flaked pitch storage silo, identified as S-3, constructed in 1994, with a storage capacity of 2,200 cubic feet, with product conveyed to the mixer via auger, equipped with a passive (positive pressure) baghouse identified as BG-3 for control of particulate emissions, exhausting to stack V-3;
- (c) One (1) liquid pitch storage silo, identified as S-4, constructed in 2008, with a storage capacity of 20,000 gallons, utilizing one (1) natural gas-fired burner for heating liquid pitch, with product conveyed to the mixer via pipe, with no controls and no stack.
- (d) Three (3) target production lines consisting of the following:
  - (1) Three (3) paint booths, identified as Paint Booth 1, constructed in 1976, Paint Booth 2, constructed in 1976 and Paint Booth 3, approved in 2013 for construction, each with a maximum capacity of 118,053 units per day, each equipped with four (4) air atomized spray guns, each connected via common ductwork and exhausting to a baghouse, identified as BG-4 for control of particulate emissions, with an airflow rate of 2,500 cfm and an outlet grain loading of 0.01 grains/dscf, exhausting to stack V-4;
  - (2) Three (3) mixers, identified respectively as M-1, constructed in 1974, with a capacity of 600 gallons; M-2, constructed in 1975, with a capacity of 1,200 gallons; M-3, approved constructed in 1977, with a capacity of 600 gallons, with each mixer exhausting to one (1) oil smoke collector, identified as BG-4, for control of particulate emissions and exhausting to stack V-4;
  - (3) Three (3) mold tables for shaping of targets with no potential emissions;

- (e) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:
  - (1) One (1) natural gas-fired hot oil burner (for liquid pitch), rated at 0.7 MMBtu per hour; and
  - (2) One (1) natural gas-fired HVAC unit, rated at 0.155 MMBtu per hour.

## **SECTION B GENERAL CONDITIONS**

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

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

### **B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]**

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This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

### **B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]**

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- (a) This permit, M177-33102-00118, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### **B.5 Term of Conditions [326 IAC 2-1.1-9.5]**

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

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

### **B.6 Enforceability**

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

**B.7 Severability**

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

**B.8 Property Rights or Exclusive Privilege**

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

**B.9 Duty to Provide Information**

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(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.10 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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(a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

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

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

**B.11 Preventive Maintenance Plan [326 IAC 1-6-3]**

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(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
The Permittee shall implement the PMPs.

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

B.12 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M177-33102-00118 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.13 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.14 Permit Renewal [326 IAC 2-6.1-7]

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
  - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
  - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.15 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]**

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

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

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

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

**B.16 Source Modification Requirement**

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

**B.17 Inspection and Entry**

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

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

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

**B.18 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]**

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

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

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

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

**B.19 Annual Fee Payment [326 IAC 2-1.1-7]**

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

**B.20 Credible Evidence [326 IAC 1-1-6]**

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

## SECTION C

## SOURCE OPERATION CONDITIONS

### Entire Source

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

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

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

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

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

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

##### C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.

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

- (g) Indiana Licensed Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:
- Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

## Corrective Actions and Response Steps

### C.12 Response to Excursions or Exceedances

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

- (a) The Permittee shall take 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.13 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

### C.14 Malfunctions Report [326 IAC 1-6-2]

---

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

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

### C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

---

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

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the.

Records of required monitoring information include the following:

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

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

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

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (d) Three (3) target production lines consisting of the following:
- (1) Three (3) paint booths, identified as Paint Booth 1, constructed in 1976, Paint Booth 2, constructed in 1976 and Paint Booth 3, approved in 2013 for construction, each with a maximum capacity of 118,053 units per day, each equipped with four (4) air atomized spray guns, each connected via common ductwork and exhausting to a baghouse, identified as BG-4 for control of particulate emissions, with an airflow rate of 2,500 cfm and an outlet grain loading of 0.01 grains/dscf, exhausting to stack V-4;

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

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

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

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

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

If overspray is visibly detected the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records shall be maintained for five (5) years.

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

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan, of this permit, contains the Permittee's obligations with regard to the records required by this condition.

### Compliance Determination Requirements

#### D.1.3 Particulate

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

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

### **D.1.4 Record Keeping Requirements**

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- (a) To document the compliance status with Conditions D.1.1, D.1.3, and D.1.4, the Permittee shall comply with the following:
  - (1) To document the compliance status with condition D.1.1, the Permittee shall maintain a record of any actions taken if overspray is visibly detected.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Two (2) calcium carbonate storage silos, identified as S-1 and S-2, constructed in 1994 and 1998, respectively, with a combined storage capacity of 6,600 cubic feet and with a maximum throughput of 11,250 tons per year with product conveyed to the mixer via auger; equipped with two (2) passive (positive pressure) baghouses identified as BG-1 and BG-2 for control of particulate emissions, exhausting to stacks V-1 and V-2;
- (b) One (1) flaked pitch storage silo, identified as S-3, constructed in 1994, with a storage capacity of 2,200 cubic feet, with product conveyed to the mixer via auger, equipped with a passive (positive pressure) baghouse identified as BG-23 for control of particulate emissions, exhausting to stack V-3;
- (c) One (1) liquid pitch storage silo, identified as S-4, constructed in 2008, with a storage capacity of 20,000 gallons, utilizing one (1) natural gas-fired burner for heating liquid pitch, with product conveyed to the mixer via pipe, with no controls and no stack.
- (d) Three (3) target production lines consisting of the following:
  - (1) Three (3) paint booths, identified as Paint Booth 1, constructed in 1976, Paint Booth 2, constructed in 1976 and Paint Booth 3, approved in 2013 for construction, each with a maximum capacity of 118,053 units per day, each equipped with four (4) air atomized spray guns, each connected via common ductwork and exhausting to a baghouse, identified as BG-4 for control of particulate emissions, with an airflow rate of 2,500 cfm and an outlet grain loading of 0.01 grains/dscf, exhausting to stack V-4;
  - (2) Three (3) mixers, identified respectively as M-1, constructed in 1974, with a capacity of 600 gallons; M-2, constructed in 1975, with a capacity of 1,200 gallons; M-3, approved constructed in 1977, with a capacity of 600 gallons, with each mixer exhausting to one (1) oil smoke collector, identified as BG-4, for control of particulate emissions and exhausting to stack V-4;
  - (3) Three (3) mold tables for shaping of targets with no potential emissions;
- (e) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:
  - (1) One (1) natural gas-fired hot oil burner (for liquid pitch), rated at 0.7 MMBtu per hour; and
  - (2) One (1) natural gas-fired HVAC unit, rated at 0.155 MMBtu per hour.

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

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

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

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies), the allowable particulate emission rate from the limestone (calcium carbonate) storage silos, identified as S-1 and S-2, shall each not exceed 3.05 pounds per hour when operating at a process weight rate of 0.64 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the one (1) flaked pitch storage silo, identified as S-3, shall not exceed 2.25 pounds per hour when

operating at a process weight rate of 0.41 tons per hour.

- (c) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the three (3) mixers, identified as M-1, M-2 and M-3, shall each not exceed 2.32 pounds per hour when operating at a process weight rate of 0.43 tons per hour.

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

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

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

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

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Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan, of this permit, contains the Permittee's obligations with regard to the records required by this condition.

### Compliance Determination Requirements

#### D.2.3 Particulate Control

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- (a) In order to comply with the requirements of Condition D.2.1, the baghouses (BG-1, BG-2, and BG-3) for particulate control shall be in operation and control emissions from the two (2) limestone (calcium carbonate) storage silos, identified as S-1 and S-2, and the one (1) flaked pitch storage silo, identified as S-3 at all times that the dry material storage silos are in operation.

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

#### D.2.4 Visible Emission Notations

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- (a) Daily visible emission notations of the three (3) dry material storage silos, identified as S-1, S-2, and S-3, stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed from Stacks (V-1, V-2 and V-3), the Permittee shall take 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.

#### D.2.5 Baghouse Inspections

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An inspection shall be performed each calendar quarter of all bags controlling the dry material storage operations (Silos S-1, S-2, and S-3). All defective bags shall be replaced.

#### D.2.6 Broken or Failed Bag Detection

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- (a) For a single compartment baghouse controlling emissions from a process operated

continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the silo(s). Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

The baghouses must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-6.1 (MSOP).

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

#### **D.2.7 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the dry material storage silos, identified as S-1, S-2, and S-3, stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document the compliance status with Condition D.2.5, the Permittee shall maintain records of the baghouse inspections.
- (c) Section C - General Record Keeping Requirements, contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

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

<b>Company Name:</b>	ATK Armament Systems Commercial Products - Champion
<b>Address:</b>	232 Industrial Parkway
<b>City:</b>	Richmond, Indiana 47374
<b>Phone #:</b>	765-966-7745
<b>MSOP #:</b>	M177-33102-00118

I hereby certify that ATK Armament Systems Commercial Products - Champion is :  still in operation.

no longer in operation.

I hereby certify that ATK Armament Systems Commercial Products - Champion is :

in compliance with the requirements of MSOP M177-33102-00118.

not in compliance with the requirements of MSOP M177-33102-00118.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

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

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

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

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

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

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

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

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_ \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_ \_\_\_\_\_ AM/PM

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_  
INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

\*SEE PAGE 2

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

**326 IAC 1-6-1 Applicability of rule**

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

**326 IAC 1-2-39 "Malfunction" definition**

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

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

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

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

ATK Armament Systems Commercial Products - Champion  
232 Industrial Parkway  
Richmond, Indiana 47374

Affidavit of Construction

I, \_\_\_\_\_, being duly sworn upon my oath, depose and say:  
(Name of the Authorized Representative)

1. I live in \_\_\_\_\_ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of \_\_\_\_\_ for \_\_\_\_\_.  
(Title) (Company Name)
3. By virtue of my position with \_\_\_\_\_, I have personal  
(Company Name)  
knowledge of the representations contained in this affidavit and am authorized to make  
these representations on behalf of \_\_\_\_\_.  
(Company Name)
4. I hereby certify that ATK Armament Systems Commercial Products - Champion located at 232 Industrial Parkway, Richmond, Indiana 47374, completed construction of the clay target manufacturing operation on in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on April 18, 2013, and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M177-33102-00118, Plant ID No. 177-00118 issued on \_\_\_\_\_.
5. **Permittee, please cross out the following statement if it does not apply:** Additional (operations/facilities) were constructed/substituted as described in the attachment to this document and were not made in accordance with the construction permit.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature \_\_\_\_\_  
Date \_\_\_\_\_

STATE OF INDIANA)  
)SS

COUNTY OF \_\_\_\_\_ )

Subscribed and sworn to me, a notary public in and for \_\_\_\_\_ County and State of Indiana  
on this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_\_. My Commission expires: \_\_\_\_\_.

Signature \_\_\_\_\_  
Name \_\_\_\_\_ (typed or printed)



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

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

**TO:** Tim Emmenegger  
ATK Armament Systems Commercial Products - Champion  
PO Box 1151  
Richmond, IN 47375

**DATE:** May 27, 2014

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

**SUBJECT:** Final Decision  
Minor Source Operating Permit (MSOP) Administrative Amendment  
177-34418-00118

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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 6/13/2013

# Mail Code 61-53

IDEM Staff	VHAUN 5/27/2014	FINAL	
Name and address of Sender	 ATK Armament Systems Commercial Products - Champion Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	177-34418-00118	<b>CERTIFICATE OF MAILING ONLY</b>  AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Tim Emmenegger ATK Armament Systems Commercial Products – Champion PO Box 1151 Richmond IN 47375 (Source CAATS)										
2		Mr. Thomas Lee Clevenger 4005 South Franks Lane Selma IN 47383 (Affected Party)										
3		Richmond City Council and Mayors Office 50 North 5th Street Richmond IN 47374 (Local Official)										
4		Wayne County Commissioners 401 East Main Street Richmond IN 47374 (Local Official)										
5		Mr. Randall Shrock 2764 Abington Pike Richmond IN 47374 (Affected Party)										
6		Wayne County Health Department 401 E. Main Street Richmond IN 47374-4388 (Health Department)										
7												
8												
9												
10												
11												
12												
13												
14												
15												

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<b>5</b>			