



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: April 9, 2015

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

Source Name: Frontier-Kemper Constructors Inc

Permit Level: MSOP Administrative Amendment

Permit Number: 163-35585-00201

Source Location: 1695 Allens Lane Evansville, 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 35585.

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
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Thomas W. Easterly
Commissioner

Neal Wedding
Frontier-Kemper Constructors, Inc.
P.O. Box 6690
Evansville, IN 47719-0690

April 9, 2015

Re: 163-35585-00201
Administrative Amendment to
M163-34160-00201

Dear Mr. Wedding:

Frontier-Kemper Constructors, Inc. was issued a Minor Source Operating Permit (MSOP) No. M163-34160-00201 on April 22, 2014 for a stationary mining equipment repair and manufacturing plant located at 1695 Allens Lane, Evansville, IN. On March 11, 2015, the Office of Air Quality (OAQ) received an application from the source requesting to add an existing abrasive blasting cabinet to the permit.

1. Pursuant to 326 IAC 2-6.1-6(d)(11), this change to the permit is considered an administrative amendment because the permit is amended to add an emissions unit, subject to 326 IAC 2-1.1-3 (Exemptions).

The following is the emission unit:

One (1) abrasive blasting cabinet, identified as Unit 12, constructed in 1978, with a maximum capacity of 135 pounds of glass beads per hour and 300 pounds of steel per hour, using a dust collector for particulate control, and exhausting to stacks 3 and 4.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire MSOP as amended. The permit references the below listed attachments. Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this amendment:

Attachment A: 40 CFR Part 60, Subpart IIII (4I) - New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines

Attachment B: 40 CFR Part 63, Subpart ZZZZ (4Z) - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

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 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>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.



A State that Works

Frontier-Kemper Constructors, Inc.
Evansville, Indiana
Permit Reviewer: Daniel W Pell

Page 2 of 2
Administrative Amendment No. 163-35585-00201

If you have any questions on this matter, please contact Daniel W Pell of my staff at 317-234-8532 or 1-800-451-6027, and ask for extension 4-8532.

Sincerely,



Iryn Calilung
Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit, TSD, and Appendix A

TS/dwp

cc: File - Vanderburgh County
Vanderburgh County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch



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Michael R. Pence
 Governor

Thomas W. Easterly
 Commissioner

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

**Frontier-Kemper Constructors, Inc.
 1695 Allens Lane
 Evansville, Indiana 47710**

(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.: M163-34160-00201	
Original Signed/Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 22, 2019 Expiration Date: April 22, 2019

First Administrative Amendment No.: 163-35585-00201	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: April 9, 2015 Expiration Date: April 22, 2019

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Attachment A: 40 CFR Part 60, Subpart IIII (4I) - New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines

Attachment B: 40 CFR Part 63, Subpart ZZZZ (4Z) - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines

SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary mining equipment repair and manufacturing operation.

Source Address:	1695 Allens Lane, Evansville, Indiana 47710
General Source Phone Number:	(812) 426-2741
SIC Code:	1629 (Heavy Construction, Not Elsewhere Classified)
County Location:	Vanderburgh
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) coal slag abrasive cleaning operation, identified as EU-01, constructed in 1987, with a maximum capacity of 1584 pounds of coal slag per hour and 1250 pounds of steel per hour, using a dust collector for particulate control, and exhausting to stack S2;
- (b) One (1) spray coating booth equipped with two (2) HVLP spray guns, only one (1) gun can be used at a time, identified as EU-02, constructed in 1978, with a maximum capacity of 0.125 units of metal equipment per hour, using dry filters for particulate control, and exhausting to stack S1;
- (c) Two (2) 20-gallon cold cleaner degreasers, collectively identified as EU-03, all degreasers were constructed in 1978, with a total combined maximum throughput of 400 gallons per year, using no control, and exhausting to stacks S3 and S4;
- (d) One (1) woodworking operation, identified as EU-04, constructed in 1978, with a maximum capacity of 22 pounds of wood per hour, using a dust collector for particulate control, and exhausting indoors;
- (e) Two (2) fuel storage tanks, collectively identified as EU-05, all tanks were constructed in 1978, consisting of one (1) diesel storage tank and one (1) kerosene storage tank, each with a maximum capacity of 500 gallons;
- (f) Four (4) lubricant oil storage tanks, collectively identified as EU-06, all tanks were constructed in 1978, each with a maximum capacity of 330 gallons, and a maximum of 1 turnover per year;
- (g) Metal cutting operation, identified as EU-07, using no control, and exhausting to stacks S3 and S4, consisting of:

- (1) three (3) oxyacetylene cutting stations, constructed in 1978, each with a maximum cutting rate of 15 inches of metal per minute, and
- (2) one (1) plasma cutting station, constructed in 2007, with a maximum cutting rate of 90 inches of metal per minute;
- (h) Grinding operation, identified as EU-08, constructed in 1978, consisting of three (3) bench grinders and one (1) band saw, each with a maximum throughput capacity of 0.015 tons of iron per hour, using no control and exhausting to stacks S3 and S4;
- (i) Welding operation, identified as EU-09, constructed in 1978, using no control, and exhausting to stacks S3 and S4, consisting of
 - (1) three (3) flux core arc welding stations, each with a maximum usage rate of 3.9 pounds of welding rod per hour, and
 - (2) one (1) shielded metal arc welding station, with a maximum usage rate of 0.1 pounds of welding rod per hour;
- (j) One (1) waste oil heater, identified as EU-10, constructed in 1978, with a maximum heat input capacity of 0.185 million Btu per hour, and exhausting to stacks S3 and S4;
- (k) One (1) diesel-fired emergency generator, identified as EU-11, approved for construction in 2014, rated at 85 horsepower, with a maximum fuel consumption of 4.32 gallons per hour, and exhausting to stack S5.

Under 40 CFR Part 60, Subpart IIII (4I) and 40 CFR Part 63, Subpart ZZZZ (4Z), this is considered an affected facility

- (l) One (1) abrasive blasting cabinet, identified as Unit 12, constructed in 1978, with a maximum capacity of 135 pounds of glass beads per hour and 300 pounds of steel per hour, using a dust collector for particulate control, and exhausting to stacks 3 and 4.

SECTION B GENERAL CONDITIONS

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

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

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

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]

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 described in the application or the permit. The emission units covered in this permit may continue operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as described.
- (b) If actual construction of the emission units differs from the construction described in the application, the source may not continue 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)]

- (a) This permit, M163-34160-00201, 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]

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

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

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

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

B.9 Duty to Provide Information

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

- (a) All terms and conditions of permits established prior to M163-34160-00201 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]

- (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

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]

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]

- (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]

- (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]

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.

Note; This source is not located in Pigeon Township or City of Evansville.

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]

- (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]

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

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

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

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

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than

twenty percent (20%) of full scale. 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

C.12 Response to Excursions or Exceedances

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

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

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

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

C.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. 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]

- (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:

- (a) One (1) coal slag abrasive cleaning operation, identified as EU-01, constructed in 1987, with a maximum capacity of 1584 pounds of coal slag per hour and 1250 pounds of steel per hour, using a dust collector for particulate control, and exhausting to stack S2;
- (b) One (1) spray coating booth equipped with two (2) HVLP spray guns, only one (1) gun can be used at a time, identified as EU-02, constructed in 1978, with a maximum capacity of 0.125 units of metal equipment per hour, using dry filters for particulate control, and exhausting to stack S1;
- (d) One (1) woodworking operation, identified as EU-04, constructed in 1978, with a maximum capacity of 22 pounds of wood per hour, using a dust collector for particulate control, and exhausting indoors;
- (g) Metal cutting operation, identified as EU-07, using no control, and exhausting to stacks S3 and S4, consisting of:
 - (1) three (3) oxyacetylene cutting stations, constructed in 1978, each with a maximum cutting rate of 15 inches of metal per minute, and
 - (2) one (1) plasma cutting station, constructed in 2007, with a maximum cutting rate of 90 inches of metal per minute;
- (h) Grinding operation, identified as EU-08, constructed in 1978, consisting of three (3) bench grinders and one (1) band saw, each with a maximum throughput capacity of 0.015 tons of iron per hour, using no control and exhausting to stacks S3 and S4;
- (i) Welding operation, identified as EU-09, constructed in 1978, using no control, and exhausting to stacks S3 and S4, consisting of
 - (1) three (3) flux core arc welding stations, each with a maximum usage rate of 3.9 pounds of welding rod per hour, and
 - (2) one (1) shielded metal arc welding station, with a maximum usage rate of 0.1 pounds of welding rod per hour;
- (j) One (1) waste oil heater, identified as EU-10, constructed in 1978, with a maximum heat input capacity of 0.185 million Btu per hour, and exhausting to stacks S3 and S4;
- (k) One (1) diesel-fired emergency generator, identified as EU-11, approved for construction in 2014, rated at 85 horsepower, with a maximum fuel consumption of 4.32 gallons per hour, and exhausting to stack S5.

Under 40 CFR Part 60, Subpart IIII (4I) and 40 CFR Part 63, Subpart ZZZZ (4Z), this is considered an affected facility

- (l) One (1) abrasive blasting cabinet, identified as Unit 12, constructed in 1978, with a maximum capacity of 135 pounds of glass beads per hour and 300 pounds of steel per hour, using a dust collector for particulate control, and exhausting to stacks 3 and 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 6.5]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions shall be limited as specified in the following table:

Emission Unit Description	Particulate emission limit (grains per dry standard cubic foot (dscf))
coal slag abrasive cleaning operation (EU-01)	0.03
spray coating booth (EU-02)	0.03
woodworking operation (EU-04)	0.03
metal cutting operation (EU-07)	0.03
metal grinding operation (EU-08)	0.03
welding operation (EU-09)	0.03
waste oil heater (EU-10)	0.03
diesel-fired emergency generator (EU-11)	0.03
abrasive blasting cabinet (Unit 12)	0.03

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

A Preventive Maintenance Plan is required for the coal slag abrasive cleaning operation (EU-01), the abrasive blasting cabinet (Unit 12), the spray coating booth (EU-02), and the woodworking operation (EU-04) and any associated control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.3 Particulate Control

In order to comply with Condition D.1.1, the dust collector shall be in operation at all times the coal slag abrasive cleaning operation (EU-01) is in operation, the abrasive blasting cabinet (Unit 12) is in operation, the dry filter shall be in operation at all times the spray coating booth (EU-02) is in operation, and the dust collector shall be in operation at all times the woodworking operation (EU-04) is in operation.

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

D.1.4 Visible Emissions Notations

- (a) Visible emission notations of the coal slag abrasive cleaning operation stack exhaust (Stack S2) and the abrasive blasting cabinet stack exhausts (Stacks 3 and 4), 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 reasonable response steps shall be considered a deviation from this permit.

D.1.5 Broken or Failed Bag Detection

- (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 C - Response to Excursions or Exceedances).
- (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 emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Response to Excursions or Exceedances).

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

D.1.6 Dry Filter Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray coating booth stack (Stack S1), while the booth is 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 the presence of overspray on the rooftops and the nearby ground. If a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.4, the Permittee shall maintain a daily record of visible emission notations of coal slag abrasive cleaning operation stack exhaust (Stack S2) and the abrasive blasting cabinet stack exhausts (Stacks 3 and 4). 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 weekly overspray observations and daily filter inspections and monthly overspray inspections of the sides of the building and the nearby ground.

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

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (k) One (1) diesel-fired emergency generator, identified as EU-11, approved for construction in 2014, rated at 85 horsepower, with a maximum fuel consumption of 4.32 gallons per hour, and exhausting to stack S5.

Under 40 CFR Part 60, Subpart IIII (4I) and 40 CFR Part 63, Subpart ZZZZ (4Z), this is considered an affected facility

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

New Source Performance Standards (NSPS) Requirements [40 CFR Part 60]

E.1.1 General Provisions Relating to New Source Performance Standards (NSPS) [40 CFR Part 60, Subpart A] [326 IAC 12-1]

Pursuant to 40 CFR 60.4219, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1, as specified in Table 8 of 40 CFR Part 60, Subpart IIII (4I) in accordance with schedule in 40 CFR 60 Subpart IIII (4I).

E.1.2 NSPS for Stationary Compression Ignition Internal Combustion Engines [40 CFR Part 60, Subpart IIII (4I)] [326 IAC 12-1]

The Permittee, which owns and operates emergency generators, shall comply with the following provisions of 40 CFR Part 60, Subpart IIII (4I) (included as Attachment A of this permit), which are incorporated by reference as 326 IAC 12, for the diesel-fired emergency generator:

- (a) 40 CFR 60.4200(a)(2) and (4), (c)
- (b) 40 CFR 60.4205(b)
- (c) 40 CFR 60.4206
- (d) 40 CFR 60.4207(b)
- (e) 40 CFR 60.4208
- (f) 40 CFR 60.4209
- (g) 40 CFR 60.4211(a), (c), (f), and (g)
- (h) 40 CFR 60.4212
- (i) 40 CFR 60.4214(b)
- (j) 40 CFR 60.4218
- (k) 40 CFR 60.4219
- (l) Table 8 to Subpart IIII

SECTION E.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (k) One (1) diesel-fired emergency generator, identified as EU-11, approved for construction in 2014, rated at 85 horsepower, with a maximum fuel consumption of 4.32 gallons per hour, and exhausting to stack S5.

Under 40 CFR Part 60, Subpart IIII (4I) and 40 CFR Part 63, Subpart ZZZZ (4Z), this is considered an affected facility

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [40 CFR Part 63]

E.2.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR Part 63.6665, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 8 of 40 CFR Part 63, Subpart ZZZZ (4Z).

- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.2.2 NESHAP for Stationary Reciprocating Internal Combustion Engines [326 IAC 20-82] [40 CFR Part 63, Subpart ZZZZ (4Z)]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (4Z) (included as Attachment B of this permit), which are incorporated by reference as 326 IAC 20-82, for the diesel-fired emergency generator:

- (a) 40 CFR 63.6580
- (b) 40 CFR 63.6585
- (c) 40 CFR 63.6590(a)(2)(iii) and (c)(1)
- (d) 40 CFR 63.6595(a)(7)
- (e) 40 CFR 63.6665
- (f) 40 CFR 63.6670
- (g) 40 CFR 63.6675

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Frontier-Kemper Constructors, Inc.
Address:	1695 Allens Lane
City:	Evansville, Indiana 47710
Phone #:	(812) 602-2246
MSOP #:	M163-34160-00201

I hereby certify that Frontier-Kemper Constructors, Inc. is: still in operation.

no longer in operation.

I hereby certify that Frontier-Kemper Constructors, Inc. is: in compliance with the requirements of MSOP M163-34160-00201.

not in compliance with the requirements of MSOP M163-34160-00201.

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

Frontier-Kemper Constructors, Inc.
1695 Allens Lane
Evansville, Indiana 47710

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 Frontier-Kemper Constructors, Inc. 1695 Allens Lane, Evansville, Indiana 47710, has constructed and will operate a mining equipment repair and manufacturing operation in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on February 7, 2014 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. M163-34160-00201, Plant ID No. 163-00201 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
Office of Air Quality**

Technical Support Document (TSD) for an Administrative Amendment to a
Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name:	Frontier-Kemper Constructors, Inc.
Source Location:	1695 Allens Lane, Evansville, IN 47710-0690
County:	Vanderburgh
SIC Code:	1629 (Heavy Construction, Not Elsewhere Classified)
Operation Permit No.:	M163-34160-00201
Operation Permit Issuance Date:	April 22, 2014
Administrative Amendment No.:	163-35585-00201
Permit Reviewer:	Daniel W Pell

On March 11, 2015, the Office of Air Quality (OAQ) received an application from Frontier-Kemper Constructors, Inc. related to a modification to an existing, stationary mining equipment repair and manufacturing plant.

Existing Approvals

The source was issued MSOP No. M163-34160-00201 on April 22, 2014. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Vanderburgh 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}	Attainment effective October 27, 2011, 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.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Evansville area, including Vanderburgh County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.	

*These documents are incorporated by reference. Copies referenced in this section may be obtained from the Government Printing Office, 732 North Capitol Street NW, Washington, D.C. 20401 or are available for review and copying at the Indiana Department of Environmental Management, Office of Legal Counsel, Indiana Government Center North, Thirteenth Floor, 100 North Senate Avenue, Indianapolis, Indiana 46204. (Air Pollution Control Division; 326 IAC 1-4-83; filed Dec 26, 2007, 1:43 p.m.: 20080123-IR-326070308FRA; filed Jun 7, 2012, 11:21 a.m.: 20120704-IR-326110742FRA; filed Jan 30, 2013, 12:34 p.m.: 20130227-IR-326110774FRA; filed Oct 25, 2013, 2:41 p.m.: 20131120-IR-326130164FRA)

- (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. Vanderburgh 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}**
Vanderburgh 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**
Vanderburgh County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Status of the Existing Source

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source, prior to the proposed amendment:

This PTE table is from the TSD or Appendix A of M163-34160-00201, issued on April 22, 2014.

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source Prior to Amendment (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
Abrasive blasting	69.4	69.4	69.4	-	-	-	-	-	-
Spray Booth	2.28	2.28	2.28	-	-	9.27	-	3.40	2.33 Xylene
Degreasing	-	-	-	-	-	1.28	-	0.0128	0.0128 Xylene
Woodworking***	0.05	0.05	0.05	-	-	-	-	-	-
Fuel Storage	-	-	-	-	0.00	-	-	Negl.	Negl.
Oil Storage*	-	-	-	-	Negl	-	-	Negl.	Negl.
Metal Cutting	2.01	2.01	2.01	-	-	-	-	0.1774	0.099 Manganese
Metal Grinding	0.0026	0.0012	0.0012	-	-	-	-	0.0069	0.003 Nickel
Welding	0.63	0.63	0.63	-	-	-	-	0.0347	0.034 Manganese
Waste Oil Heater	0.001	0.001	0.001	0.029	0.064	0.006	0.010	0.0020	0.0011 Chromium
Emergency Generator	0.046	0.046	0.046	0.043	0.653	0.053	0.141	0.0006	0.00017 Formaldehyde
Total PTE of Entire Source	74.40	74.40	74.40	0.07	0.72	10.61	0.15	3.63	2.34 Xylene
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-

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}.
 ***In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture (Cause Nos. 92-A-J-730 and 92-A-J-833). This judgment ruled that the PTE for particulate matter from the woodworking operation was calculated after consideration of the controls for purposes of determining permit level and applicability. This ruling was noted in MSOP M163-34160-00201, which was issued April 22, 2014.

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (c) **GHG**
 On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at

326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

Description of Proposed Amendment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Frontier-Kemper Constructors, Inc. on March 11, 2015, relating to the addition of an abrasive blasting cabinet to the source and permit.

The following is a list of the unpermitted emission unit:

- (a) One (1) abrasive blasting cabinet, identified as Unit 12, constructed in 1978, with a maximum capacity of 135 pounds of glass beads per hour and 300 pounds of steel per hour, using a dust collector for particulate control, and exhausting to stacks 3 and 4.

Enforcement Issues

There are no pending enforcement actions related to this amendment.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP Amendment

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

Process/ Emission Unit	PTE of Proposed Amendment (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Abrasive Blasting Cabinet - Unit 12	5.9	4.1	4.1	-	-	-	-	-	-
Total PTE of Proposed Amendment	5.9	4.1	4.1	-	-	-	-	-	-
negl. = negligible									

Pursuant to 326 IAC 2-6.1-6(d)(8), this change to the permit is considered an administrative amendment because the permit is amended to incorporate a modification that adds an emissions unit of the same type that is already permitted or replaces an existing unit and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit, and the modification does not result in a potential to emit greater than the thresholds in 326 IAC 2-2 (PSD), 326 IAC 2-3 (Emission Offset), or 326 IAC 2-7 (Part 70 Operating Permit).

PTE of the Entire Source After Issuance of the MSOP Amendment

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

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source After Issuance of the Amendment (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Abrasive Blasting EU-01	69.4	48.6	48.6	-	-	-	-	-	-
Abrasive Blasting Unit 12	5.9	4.1	4.1	-	-	-	-	-	-
Spray Booth	2.28	2.28	2.28	-	-	9.27	-	3.40	2.33 Xylene
Degreasing	-	-	-	-	-	1.28	-	0.0128	0.0128 Xylene
Woodworking ***	0.05	0.05	0.05	-	-	-	-	-	-
Fuel Storage	-	-	-	-	0.00	-	-	Negl.	Negl.
Oil Storage	-	-	-	-	Negl	-	-	Negl.	Negl.
Metal Cutting	2.01	2.01	2.01	-	-	-	-	0.1774	0.099 Manganese
Metal Grinding	0.0026	0.0012	0.0012	-	-	-	-	0.0069	0.003 Nickel
Welding	0.63	0.63	0.63	-	-	-	-	0.0347	0.034 Manganese
Waste Oil Heater	0.001	0.001	0.001	0.029	0.064	0.006	0.010	0.0020	0.0011 Chromium
Emergency Generator	0.046	0.046	0.046	0.043	0.653	0.053	0.141	0.0006	0.00017 Formaldehyde
Total PTE of Entire Source	80.3	57.8	57.8	0.07	0.72	10.6	0.15	3.6	2.34 Xylene
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-

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}.

*** In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture (Cause Nos. 92-A-J-730 and 92-A-J-833). This judgment ruled that the PTE for particulate matter from the woodworking operation was calculated after consideration of the controls for purposes of determining permit level and applicability. This ruling was noted in MSOP M163-34160-00201, which was issued April 22, 2014.

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted)

Process/ Emission Unit	Uncontrolled/Unlimited Potential To Emit of the Entire Source After Issuance of the Amendment (tons/year)								
	PM	PM10*	PM2.5**	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Abrasive Blasting EU-01	69.4	48.6	48.6	-	-	-	-	-	-
Abrasive Blasting Unit 12	5.9	4.1	4.1	-	-	-	-	-	-
Spray Booth	2.28	2.28	2.28	-	-	9.27	-	3.40	2.33 Xylene
Degreasing	-	-	-	-	-	1.28	-	0.0128	0.0128 Xylene
Woodworking***	0.05	0.05	0.05	-	-	-	-	-	-
Fuel Storage	-	-	-	-	0.00	-	-	Negl.	Negl.
Oil Storage	-	-	-	-	Negl	-	-	Negl.	Negl.
Metal Cutting	2.01	2.01	2.01	-	-	-	-	0.1774	0.099 Manganese
Metal Grinding	0.0026	0.0012	0.0012	-	-	-	-	0.0069	0.003 Nickel
Welding	0.63	0.63	0.63	-	-	-	-	0.0347	0.034 Manganese
Waste Oil Heater	0.001	0.001	0.001	0.029	0.064	0.006	0.010	0.0020	0.0011 Chromium
Emergency Generator	0.046	0.046	0.046	0.043	0.653	0.053	0.141	0.0006	0.00017 Formaldehyde
Total PTE of Entire Source	80.3	57.8	57.8	0.07	0.72	10.6	0.15	3.6	2.34 Xylene
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250		-

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}.
 *** In October 1993 a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture (Cause Nos. 92-A-J-730 and 92-A-J-833). This judgment ruled that the PTE for particulate matter from the woodworking operation was calculated after consideration of the controls for purposes of determining permit level and applicability. This ruling was noted in MSOP M163-34160-00201, which was issued April 22, 2014.

(a) **MSOP Status**

(1) **Criteria Pollutants**

This amendment to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).

(2) **HAPs**

This amendment will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

(b) **PSD Minor Source – PM**

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the uncontrolled/unlimited potential to emit PM from the entire source will

continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(c) **PSD Minor Source – Other Regulated Pollutants**

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the uncontrolled/unlimited potential to emit of all PSD regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Amendment Section above or Appendix A.

Federal Rule Applicability Determination

(a) **New Source Performance Standards (NSPS)**

There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed amendment.

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

There are no National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed amendment.

(c) **Compliance Assurance Monitoring (CAM)**

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

State Rule Applicability Determination

(a) **326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))**

MSOP applicability is discussed under the Permit Level Determination – MSOP section above.

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

See PTE of the Entire Source After Issuance of the MSOP Amendment Section above.

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

The proposed amendment is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the Abrasive Blasting Unit 12 is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

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

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

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

This source is located in Vanderburgh County, however it is not located in Pigeon Township or City of Evansville.

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

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

- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) **326 IAC 6-4 (Fugitive Dust Emissions Limitations)**
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) **326 IAC 6.5 (PM Limitations Except Lake County)**
Pursuant to 326 IAC 6.5-1-1(a)(2), the source is subject to the requirements of 326 IAC 6.5-1-2 because it is located in Vanderburgh County, is not specifically listed in 326 IAC 6.5-8, has potential particulate emissions greater than ten (10) tons per year, and has not limited actual particulate emissions to less than ten (10) tons per year.
- (h) **326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)**
Pursuant to 326 IAC 8-1-6(1), no facilities at this source are subject to 326 IAC 8-1-6 because there are no facilities with potential VOC emissions of twenty-five (25) tons or more per year.

Abrasive Blasting Cabinet Unit 12

- (i) **326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**
Pursuant to 326 IAC 6-3-1(c)(3), the provisions of 326 IAC 6-3 do not apply because the unit is subject to 326 IAC 6.5.
- (j) **326 IAC 6.5 (PM Limitations Except Lake County)**
This source is not specifically identified in 326 IAC 6.5-8. Therefore, it is subject to 326 IAC 6.5-1 because it has potential particulate emissions greater than ten (10) tons per year and does not have limited actual particulate emissions less than ten (10) tons per year.

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the Abrasive Blasting Cabinet Unit 12 shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

The dust collector shall be in operations at all times when the Abrasive Blasting Unit 12 is in operation, in order to comply with this limit.

Compliance Determination, Monitoring and Testing Requirements

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

Emission Unit	Control Device	Operating Parameters	Frequency
Abrasive Blasting Cabinet Unit 12	Dust Collector	Visible Emissions	Once per day

These monitoring conditions are necessary because the dust collector for the Abrasive Blasting Cabinet Unit 12 must operate properly to ensure compliance with 326 IAC 6.5 (Particulate Emissions Limitations Except Lake County).

- (b) There are no testing requirements applicable to this proposed amendment.
- (c) The existing compliance requirements will not change as a result of this amendment. The source shall continue to comply with the applicable requirements and permit conditions as contained in

MSOP No: M163-34160-00201, issued on April 2, 2014 with its most recent revisions and amendments.

Proposed Changes

The following changes listed below are due to the proposed amendment. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

Change No. 1: One (1) Abrasive Blasting Cabinet, identified as Unit 12, is being added to the Emission Unit Summary in the permit.

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) *****

(l) **One (1) abrasive blasting cabinet, identified as Unit 12, constructed in 1978, with a maximum capacity of 135 pounds of glass beads per hour and 300 pounds of steel per hour, using a dust collector for particulate control, and exhausting to stacks 3 and 4.**

Change No. 2: One (1) Abrasive Blasting Cabinet, identified as Unit 12, is being added to the Table in Section D.1 in the permit.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) *****

(l) **One (1) abrasive blasting cabinet, identified as Unit 12, constructed in 1978, with a maximum capacity of 135 pounds of glass beads per hour and 300 pounds of steel per hour, using a dust collector for particulate control, and exhausting to stacks 3 and 4.**

Change No. 3: One (1) Abrasive Blasting Cabinet, identified as Unit 12, is being added to the Section D.1.1 in the permit which lists the particulate limits for particulate emissions.

D.1.1 Particulate [326 IAC 6.5]

Emission Unit Description	Particulate emission limit (grains per dry standard cubic foot (dscf))
coal slag abrasive cleaning operation (EU-01)	0.03
spray coating booth (EU-02)	0.03
woodworking operation (EU-04)	0.03
metal cutting operation (EU-07)	0.03
metal grinding operation (EU-08)	0.03
welding operation (EU-09)	0.03
waste oil heater (EU-10)	0.03
diesel-fired emergency generator (EU-11)	0.03
abrasive blasting cabinet (Unit 12)	0.03

Change No. 4: One (1) Abrasive Blasting Cabinet, identified as Unit 12, is being added to the Section D.1.2 in the permit which describes the Preventative Maintenance Plan requirement. Also, the Abrasive Blasting Cabinet is being added to Section D.1.3 which describes the Particulate Control requirement.

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

A Preventive Maintenance Plan is required for the coal slag abrasive cleaning operation (EU-01), **the abrasive blasting cabinet (Unit 12)**, the spray coating booth (EU-02), and the woodworking operation (EU-04) and any associated control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

D.1.3 Particulate Control

In order to comply with Condition D.1.1, the dust collector shall be in operation at all times the coal slag abrasive cleaning operation (EU-01) is in operation, **the abrasive blasting cabinet (Unit 12) is in operation**, the dry filter shall be in operation at all times the spray coating booth (EU-02) in operation, and the dust collector shall be in operation at all times the woodworking operation (EU-04) is in operation.

Change No. 5: One (1) Abrasive Blasting Cabinet, identified as Unit 12, is being added to the Section D.1.4 in the permit which describes the requirements of Visible Emissions Notations. Also, the Abrasive Blasting Cabinet is being added to Section D.1.7 which describes the Record Keeping Requirements.

D.1.4 Visible Emissions Notations

(a) Visible emission notations of the coal slag abrasive cleaning operation stack exhaust (Stack S2) **and the abrasive blasting cabinet stack exhausts (Stacks 3 and 4)**, shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

D.1.7 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.4, the Permittee shall maintain a daily record of visible emission notations of coal slag abrasive cleaning operation stack exhaust (Stack S2) **and the abrasive blasting cabinet stack exhausts (Stacks 3 and 4)**. 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).

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on March 11, 2015, and additional information received through email on March 26, 2015.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Daniel W Pell at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-8532 or toll free at 1-800-451-6027 extension 4-8532.
- (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: Emission Calculations
Source Summary**

Company Name: Frontier-Kemper Constructors, Inc.
Address City IN Zip: 1695 Allens Lane, Evansville, IN 47710
Permit No.: 163-35585-00201
Reviewer: Daniel W Pell

Uncontrolled PTE (tons/year)										
Process	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Single HAPs	
Abrasive Blasting EU-01	69.4	48.6	48.6	-	-	-	-	-	-	-
Abrasive Blasting Unit 12	5.9	4.1	4.1	-	-	-	-	-	-	-
Spray Booth	2.28	2.28	2.28	-	-	9.27	-	3.40	2.33	Xylene
Degreasing	-	-	-	-	-	1.28	-	0.0128	0.0128	Xylene
Woodworking	0.05	0.05	0.05	-	-	-	-	-	-	-
Fuel storage	-	-	-	-	0.00	-	-	Negl.	Negl.	
Oil storage*	-	-	-	-	Negl	-	-	Negl.	Negl.	
Metal cutting	2.01	2.01	2.01	-	-	-	-	0.1774	0.099	Manganese
Metal grinding	0.0026	0.0012	0.0012	-	-	-	-	0.0069	0.003	Nickel
Welding	0.63	0.63	0.63	-	-	-	-	0.0347	0.034	Manganese
Waste oil heater	0.001	0.001	0.001	0.029	0.064	0.006	0.010	0.0020	0.0011	Chromium
Emergency generator	0.046	0.046	0.046	0.043	0.653	0.053	0.141	0.0006	0.00017	Formaldehyde
Total	80.31	57.76	57.76	0.07	0.72	10.61	0.15	3.63	2.34	Xylene

*The four 330 gallon oil storage tanks have less than 1 turnovers per year and therefore emissions are negligible

Controlled PTE (tons/year)										
Process	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Single HAPs	
Abrasive Blasting EU-01	1.39	0.97	0.97	-	-	-	-	-	-	-
Abrasive Blasting Unit 12	0.12	0.08	0.08	-	-	-	-	-	-	-
Spray Booth	2.28	2.28	2.28	-	-	9.27	-	3.40	2.33	Xylene
Degreasing	-	-	-	-	-	1.28	-	0.0128	0.0128	Xylene
Woodworking	0.05	0.05	0.05	-	-	-	-	-	-	-
Fuel storage	-	-	-	-	0.00	-	-	Negl.	Negl.	
Oil storage*	-	-	-	-	Negl	-	-	Negl.	Negl.	
Metal cutting	2.01	2.01	2.01	-	-	-	-	0.1774	0.099	Manganese
Metal grinding	0.0026	0.0012	0.0012	-	-	-	-	0.0069	0.003	Nickel
Welding	0.63	0.63	0.63	-	-	-	-	0.0347	0.034	Manganese
Waste oil heater	0.001	0.001	0.001	0.029	0.064	0.006	0.010	0.0020	0.0011	Chromium
Emergency generator	0.046	0.046	0.046	0.043	0.653	0.053	0.141	0.0006	0.00017	Formaldehyde
Total	6.52	6.07	6.07	0.07	0.72	10.61	0.15	3.63	2.34	Xylene

**Appendix A: Emission Calculations
Abrasive Cleaner - EU-01**

Company Name: Frontier-Kemper Constructors, Inc.
Address City IN Zip: 1695 Allens Lane, Evansville, IN 47710
Permit No.: 163-35585-00201
Reviewer: Daniel W Pell

Emission Factors for Abrasives

Abrasive	lb PM/lb abrasive	lb PM ₁₀ /lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other - Coal slag	0.010	0.70

Uncontrolled PTE			Emission factors		Uncontrolled PTE - PM		Uncontrolled PTE - PM ₁₀ / PM _{2.5}	
Emission Unit	Abrasive type	Flow rate (lb/hr)	PM (lb/lb abrasive)	PM ₁₀ (lb/lb PM)	lb/hr	ton/yr	lb/hr	ton/yr
Abrasive cleaning	Coal slag	1584	0.010	0.70	15.8	69.4	11.1	48.6

Controlled PTE		Controlled PTE - PM		Controlled PTE - PM ₁₀ / PM _{2.5}	
Emission Unit	Control Efficiency	lb/hr	ton/yr	lb/hr	ton/yr
Abrasive cleaning	98%	0.32	1.39	0.22	0.97

Notes:

Emission factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)
PM₁₀=PM_{2.5}

Methodology:

Uncontrolled PTE of PM (lb/hr) = Flow rate (lb/hr) * PM emission factor (lb/lb abrasive)

Uncontrolled PTE of PM₁₀ (lb/hr) = Uncontrolled PTE of PM (lb/hr) * PM₁₀ emission factor (lb/lb PM)

Uncontrolled PTE (lb/day) = Uncontrolled PTE (lb/hr) * 24 hrs/day

Uncontrolled PTE (ton/yr) = Uncontrolled PTE (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

Controlled PTE = Uncontrolled PTE * (1 - Control efficiency)

326 IAC 6-3-2 Limit

Emission Unit	Material throughput (lb/hr)	Abrasive throughput (lb/hr)	Process weight rate (ton/hr)	Allowable emissions (lb/hr)	Control efficiency needed
Abrasive cleaning	1250	1584.0	1.42	5.18	67.3%

Methodology:

Process weight rate (ton/hr) = (Material throughput (lb/hr) + Abrasive throughput (lb/hr)) / 2000 lb/ton

Allowable emission (lb/hr) = 4.10 * Process weight rate (ton/hr)^{0.67}, pursuant to 326 IAC 6-3-2(e)

Control efficiency needed = 1 - (Limited emissions (lb/hr) / Unlimited PTE (lb/hr))

**Appendix A: Emission Calculations
Abrasive Blasting Cabinet - Unit 12**

Company Name: Frontier-Kemper Constructors, Inc.
Address City IN Zip: 1695 Allens Lane, Evansville, IN 47710
Permit No.: 163-35585-00201
Reviewer: Daniel W Pell

Emission Factors for Abrasives

Abrasive	lb PM/lb abrasive	lb PM ₁₀ /lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other - Glass Beads	0.010	0.70

Uncontrolled PTE			Emission factors		Uncontrolled PTE - PM		Uncontrolled PTE - PM10 / PM2.5	
Emission Unit	Abrasive type	Flow rate (lb/hr)	PM (lb/lb abrasive)	PM ₁₀ (lb/lb PM)	lb/hr	ton/yr	lb/hr	ton/yr
Abrasive cleaning	Glass Beads	135	0.010	0.70	1.4	5.9	0.9	4.1
Total Uncontrolled PTE:					1.4	5.9	0.9	4.1

Controlled PTE		Controlled PTE - PM		Controlled PTE - PM10 / PM2.5	
Emission Unit	Control Efficiency	lb/hr	ton/yr	lb/hr	ton/yr
Abrasive cleaning	98%	0.03	0.12	0.02	0.08

Notes:

Emission factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)
 PM₁₀=PM_{2.5}

Methodology:

Uncontrolled PTE of PM (lb/hr) = Flow rate (lb/hr) * PM emission factor (lb/lb abrasive)
 Uncontrolled PTE of PM₁₀ (lb/hr) = Uncontrolled PTE of PM (lb/hr) * PM₁₀ emission factor (lb/lb PM)
 Uncontrolled PTE (lb/day) = Uncontrolled PTE (lb/hr) * 24 hrs/day
 Uncontrolled PTE (ton/yr) = Uncontrolled PTE (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs
 Controlled PTE = Uncontrolled PTE * (1 - Control efficiency)

326 IAC 6-3-2 Limit

Emission Unit	Material throughput (lb/hr)	Abrasive throughput (lb/hr)	Process weight rate (ton/hr)	Allowable emissions (lb/hr)	Control efficiency needed
Abrasive cleaning	300	135.0	0.22	1.48	-9.3%

Methodology:

Process weight rate (ton/hr) = (Material throughput (lb/hr) + Abrasive throughput (lb/hr)) / 2000 lb/ton
 Allowable emission (lb/hr) = 4.10 * Process weight rate (ton/hr)^{0.67}, pursuant to 326 IAC 6-3-2(e)
 Control efficiency needed = 1 - (Limited emissions (lb/hr) / Unlimited PTE (lb/hr))

**Appendix A: Emission Calculations
Spray Booth**

Company Name: Frontier-Kemper Constructors, Inc.
Address City IN Zip: 1695 Allens Lane, Evansville, IN 47710
Permit No.: 163-35585-00201
Reviewer: Daniel W Pell

Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water & Exempt VOC	Weight % VOC	Volume % Water & Exempt VOC	Volume % Solids	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Maximum usage (gal/day)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	VOC content (lb/gal coating solids)	PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of PM / PM10 / PM2.5 (ton/yr)	Transfer Efficiency
94-637	9.85	43.64%	0%	43.64%	0.0%	53.0%	3.000	0.125	9.00	4.30	4.30	8.11	1.61	38.69	7.06	2.28	75%
97-727	7.26	100.0%	0%	100.0%	0.0%	0.0%	0.375	0.125	1.13	7.26	7.26	N/A	0.34	8.17	1.49	0.00	75%
861	6.60	100.0%	20%	80.0%	20.0%	0.0%	0.250	0.125	0.75	5.28	6.61	N/A	0.17	3.96	0.72	0.00	75%
Totals:													2.12	50.82	9.27	2.28	

Notes:

861 is a minimum of 20% acetone, an exempt VOC.

The spray booth is equipped with 2 spray guns, only one gun can be used at a time.

PM=PM₁₀=PM_{2.5}

Methodology:

Weight % Volatile (Water & Organics) = Weight % VOC + Weight % Water & Exempt VOC

Volume % Water & Exempt VOC = Weight % Acetone * Density of material (lb/gal) / Density of acetone (6.60 lb/gal)

Maximum usage (gal/day) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day

VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC

VOC content (lb/gal coating less coating) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)

VOC content (lb/gal coating solids) = Density (lb/gal) * Weight % VOC / Volume % Solids

PTE of VOC (lb/hr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr)

PTE of VOC (lb/day) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 24 hrs/day

PTE of VOC (ton/yr) = VOC content (lb/gal coating) * Usage rate (gal/unit) * Maximum throughput (unit/hr) * 8760 hrs/yr * 1 ton/2000 lbs

PTE of PM (ton/yr) = Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal) * (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs

Hazardous Air Pollutants (HAPs)

Material	Density (lb/gal)	Usage rate (gal/unit)	Maximum throughput (unit/hr)	Xylene		Ethylbenzene		Toluene		Cumene		Methanol		2-Butoxyethanol		
				% Weight	PTE (ton/yr)	% Weight	PTE (ton/yr)	% Weight	PTE (ton/yr)	% Weight	PTE (ton/yr)	% Weight	PTE (ton/yr)	% Weight	PTE (ton/yr)	
94-637	9.85	3.000	0.125	5.12%	0.83	-	-	0.01%	0.002	0.05%	0.008	-	-	-	-	
97-727	7.26	0.375	0.125	100%	1.49	30%	0.45	1%	0.01	-	-	-	-	-	-	
861	6.60	0.250	0.125	1.05%	0.01	-	-	26%	0.24	-	-	35%	0.32	5%	0.05	
Totals:					2.33		0.45		0.25		0.01		0.32		0.05	
																Total HAPs: 3.40

Notes:

Highest percent of each HAPs as provided in the MSDS was used as a worst-case assumption

94-637 contains the following HAP-containing solvent blends:

13% hydrotreated light distillate (CAS# 64742-47-8), which is 0.1% Toluene

7% Stoddard solvent (CAS# 8052-41-3), which is 1.0% Xylene

5% light aromatic solvent naphtha (CAS# 64742-95-6), which is 1% Xylene and 1% Cumene

861 contains 35% Light aliphatic solvent naphtha (CAS #64742-89-8), which is 3% toluene and 3% xylene

Methodology:

PTE of HAP (ton/yr) = Weight % HAP * Usage rate (gal/unit) * Maximum throughput (unit/hr) * Density (lb/gal) * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Degreasers**

Company Name: Frontier-Kemper Constructors, Inc.
Address City IN Zip: 1695 Allens Lane, Evansville, IN 47710
Permit No.: 163-35585-00201
Reviewer: Daniel W Pell

Material	Density (lb/gal)	Weight % VOC	Max usage (gal/yr)	PTE of VOC (ton/yr)	Weight % Xylene	PTE of Xylene (ton/yr)
Stoddard Solvent	6.40	100%	400	1.280	1.0%	0.0128

Methodology:

*Pursuant to 40 CFR 63, Stoddard solvent (CAS # 8052-41-3) typically has an average organic HAP composition of 1.0% xylene.

$\text{PTE of VOC (ton/yr)} = \text{Density (lb/gal)} * \text{Weight \% VOC} * \text{Max usage (gal/yr)}$

**Appendix A: Emission Calculations
Woodworking**

Company Name: Frontier-Kemper Constructors, Inc.
Address City IN Zip: 1695 Allens Lane, Evansville, IN 47710
Permit No.: 163-35585-00201
Reviewer: Daniel W Pell

Particulate collected (lb/wk)	Normal operating hours (hr/wk)	Particulate collection rate (lb/hr)	Control efficiency	Uncontrolled PTE of PM / PM10 / PM2.5 (lb/hr)	Uncontrolled PTE of PM / PM10 / PM2.5 (ton/yr)	Controlled PTE of PM / PM10 / PM2.5 (lb/hr)	Controlled PTE of PM / PM10 / PM2.5 (ton/yr)
14	13.5	1.037	99.0%	1.05	4.59	0.010	0.046

Note:

PM=PM₁₀=PM_{2.5}

Control devices for woodworking is considered integral, therefore PTE after control is considered for permit level determination.

Methodology:

Particulate collection rate (lb/hr) = Particulate collected (lb/wk) / Normal operating hours (hr/wk)

Uncontrolled PTE (lb/hr) = Particulate collection rate (lb/hr) / Control efficiency

Uncontrolled PTE of PM (ton/yr) = Uncontrolled PTE of PM (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

Controlled PTE = Uncontrolled PTE * (1 - Control efficiency)

In October 1993, a Final Order Granting Summary Judgment was signed by Administrative Law Judge ("ALJ") Garrettson resolving an appeal filed by Kimball Hospitality Furniture (Cause Nos. 92-A-J-730 and 92-A-J-833). This judgment ruled that the PTE for particulate matter from the woodworking operation was calculated after consideration of the controls for purposes of determining permit level and applicability. This ruling was noted in MSOP M163-34160-00201, which was issued April 22, 2014.

**Appendix A: Emission Calculations
Fuel Storage**

Company Name: Frontier-Kemper Constructors, Inc.
Address City IN Zip: 1695 Allens Lane, Evansville, IN 47710
Permit No.: 163-35585-00201
Reviewer: Daniel W Pell

Tank	Tank Working Capacity	Throughput (gal/yr)	Working losses (lb/yr)	Breathing losses (lb/yr)	PTE of VOC (ton/yr)
Diesel	500	5754	0.14	0.22	0.00018
Kerosene	500	1000	0.03	0.28	0.00016
Total:					0.00034

Note:
Tank emissions were calculated using Tanks 4.0.9d.
The source has one 500-gallon diesel storage tank and one 500-gallon kerosene storage tank
Each tank has a diameter of 4 ft, length of 6 ft, and is gray in color
Throughput is the maximum gallons of each fuel the source uses in a year.

Methodology:
 $PTE\ of\ VOC\ (ton/yr) = (Working\ losses\ (lb/yr) + Breathing\ losses\ (lb/yr)) * 1\ ton/2000\ lbs$

**Appendix A: Emission Calculations
Metal Cutting and Welding**

Company Name: Frontier-Kemper Constructors, Inc.
Address City IN Zip: 1695 Allens Lane, Evansville, IN 47710
Permit No.: 163-35585-00201
Reviewer: Daniel W Pell

Metal cutting			Emission Factors (lb/1000 in. cut)				
Process	Maximum metal cutting rate (in/min)	Number of stations	PM / PM10 / PM2.5	Cr	Co	Mn	Ni
Oxyacetylene cutting	15	3	0.1622	0.0003	-	0.0005	0.0001
Plasma cutting	90	1	0.0039	-	-	-	-
			Potential emissions (PTE)				
Total PTE (lb/hr):			0.4589	0.01350	-	0.02250	0.00450
Total PTE (ton/yr):			2.010	0.059130	-	0.0986	0.019710
			Total HAPs: 0.177				

Notes:
Emission Factor for oxyacetylene cutting from American Welding Society (AWS) for cutting 1 inch thick metal.
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.
PM = PM₁₀ = PM_{2.5}

Methodology:
Plasma cutting emission factor (lb PM/1,000 in. cut, 8 mm thick) (Using AWS average values) = (0.25 g/min)/(3.6 m/min) * (0.0022 lb/g)/(39.37 in/m) * (1,000 in.)
PTE of PM (lb/hr) = Number of stations * Max metal cutting rate (in/min) * 60 min/hr * Emission factor (lb PM/1000 in. cut) / 1000 in.
PTE of PM (ton/yr) = PTE (lb/hr) * 8760 hr/yr * 1 ton/2000 lbs

Welding			Emission Factors (lb/lb electrode)				
Process/electrode	Max electrode consumption (lb/hr)	Number of stations	PM / PM10 / PM2.5	Cr	Co	Mn	Ni
FCAW (E71T electrode)	3.9	3	0.0122	0.000002	0.000001	0.0007	0.000004
SMAW (E7018 electrode)	0.1	1	0.0184	0.000006	0.000001	0.0010	0.000002
			Potential emissions (PTE)				
Total PTE (lb/hr):			0.1446	0.000024	0.000012	0.0078	0.000047
Total PTE (ton/yr):			0.633	0.000105	0.000052	0.0344	0.000206
			Total HAPs: 0.035				

Notes:
PM = PM₁₀ = PM_{2.5}

Methodology:
PTE (ton/yr) = Max electrode usage (lb/hr) * Number of Stations * Emission factor (lb pollutant/lb electrode)
PTE (ton/yr) = PTE (lb/hr) * 8760 hr/yr * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Metal Grinding**

Company Name: Frontier-Kemper Constructors, Inc.
Address City IN Zip: 1695 Allens Lane, Evansville, IN 47710
Permit No.: 163-35585-00201
Reviewer: Daniel W Pell

Unit	Grinding rate (ton iron/hr)	Emission Factors (lb/ton iron processed)		PTE (lb/hr)		PTE (ton/yr)	
		PM	PM10 / PM2.5	PM	PM10 / PM2.5	PM	PM10 / PM2.5
Bench grinder	0.015	0.01	0.0045	0.0002	0.00007	0.0007	0.0003
Bench grinder	0.015	0.01	0.0045	0.0002	0.00007	0.0007	0.0003
Bench grinder	0.015	0.01	0.0045	0.0002	0.00007	0.0007	0.0003
Band saw	0.015	0.01	0.0045	0.0002	0.00007	0.0007	0.0003
Total:						0.0026	0.0012

Hazardous Air Pollutants (HAPs)

	Arsenic	Cadmium	Chromium	Cobalt	Nickel	Lead	Selenium
Emission Factors (lb/ton metal processed)	0.00221	0.00102	0.00646	0.00051	0.01139	0.0045	0.00017
PTE (ton/yr/unit)	1.45E-04	6.70E-05	4.24E-04	3.35E-05	7.48E-04	2.96E-04	1.12E-05
Total PTE (ton/yr)	5.81E-04	2.68E-04	1.70E-03	1.34E-04	2.99E-03	1.18E-03	4.47E-05
Total HAPs:							6.90E-03

Notes:

Emission factors are from FIRE Volume II, Chapter 14, Grey Stone Iron Foundries - SCC 3-04-003-60 (Castings finishing)
PM₁₀ = PM_{2.5}

Methodology:

PTE (lb/hr) = Grinding rate (ton iron/hr) * Emission factor (lb/ton iron processed)

PTE (ton/yr) = Grinding rate (ton iron/hr) * Emission factor (lb/ton iron processed) * 1 ton/2000 lbs* 8760 hrs/yr

**Appendix A: Emission Calculations
Waste Oil Heater**

Company Name: Frontier-Kemper Constructors, Inc.
Address City IN Zip: 1695 Allens Lane, Evansville, IN 47710
Permit No.: 163-35585-00201
Reviewer: Daniel W Pell

Emission unit	Heat Input Capacity (MMBtu/hr)	Total Potential Throughput (kgal/yr)
Waste oil space heater	0.185	11.7

Weight % ash	Weight % sulfur	Weight % lead
0.05	0.05	0.04

	Pollutant						
	PM*	PM ₁₀ *	PM _{2.5} *	SO ₂	NO _x	VOC	CO
Emission Factor (lb/kgal)	0.14	0.14	0.14	5.00	11.0	1.00	1.70
Potential Emissions (tons/yr)	0.001	0.001	0.001	0.029	0.064	0.006	0.010

*No information was given in AP-42 regarding whether the PM emission factor included filterable and condensable PM.

No Emission factor listed for PM₁₀ or PM_{2.5}. Therefore, PM = PM₁₀ = PM_{2.5}

	HAPs - Metals					
	Arsenic	Chromium	Cobalt	Lead	Nickel	Phosphorus
Emission Factor (lb/kgal)	2.5E-03	1.9E-01	5.7E-03	1.6E-02	5.0E-02	3.6E-02
Potential Emissions (tons/yr)	1.46E-05	1.11E-03	3.32E-05	9.56E-05	2.91E-04	2.10E-04

	HAPs - Organics				
	Naphthalene	Phenanthrene/ anthracene	Pyrene	Benz(a)anthracene /chrysene	Benzo(a) pyrene
Emission Factor (lb/kgal)	1.3E-02	1.1E-02	7.1E-03	4.0E-03	4.0E-03
Potential Emissions (tons/yr)	7.58E-05	6.41E-05	4.14E-05	2.33E-05	2.33E-05
Total HAPs:					1.980E-03

	Greenhouse Gas		
	CO ₂	CH ₄	N ₂ O
Emission Factor (kg/MMBtu)	74.00	0.003	0.0006
Potential Emission (tons/yr)	132	0.3	0.1
Summed Potential Emissions (tons/yr)	133		
CO ₂ e Total (tons/yr) based on 10/30/2009 federal GWPs	160		
CO ₂ e Total (tons/yr) based on 11/29/2013 federal GWPs	161		

Notes:

MMBtu = 1,000,000 Btu

1 gallon of waste fuel oil has a heating value of 139,000 Btu

Emission Factors are from AP-42, Chapter 1.4, Tables 1.11-1 through 1.11-5 (SCC #1-05-001-14 and 1-05-002-14)

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

Additional HAPs emission factors are available in AP-42, Chapter 1.11.

Greenhouse Gas Emission Factors are from Tables C-1 and 2 of 40 CFR Part 98 Subpart C.

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

Methodology:

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) * 8,760 hrs/yr * 1kgal/1000 gal * 1 gal/0.139 MMBtu

Potential Emissions (tons/yr) = Potential Throughput (kgal/yr) * Emission Factor (lb/kgal) * 1 ton/2000 lbs

GHG Emissions (tons/yr) = Heat Input Capacity MMBtu/hr * Emission Factor (kg/MMBtu) * 2.20462 lb/kg * 8760 hrs/yr * 1 ton/2000 lbs

CO₂e (tons/yr) based on 10/30/2009 federal GWPs = CO₂ Potential Emission (tons/yr) * CO₂ GWP (1) + CH₄ Potential Emission (tons/yr) * CH₄ GWP (21) + N₂O Potential Emission (tons/yr) * N₂O GWP (310).

CO₂e (tons/yr) based on 11/29/2013 federal GWPs = CO₂ Potential Emission (tons/yr) * CO₂ GWP (1) + CH₄ Potential Emission (tons/yr) * CH₄ GWP (25) + N₂O Potential Emission (tons/yr) * N₂O GWP (298).

**Appendix A: Emissions Calculations
Diesel-Fired Emergency Generator**

Company Name: Frontier-Kemper Constructors, Inc.
Address City IN Zip: 1695 Allens Lane, Evansville, IN 47710
Permit No.: 163-35585-00201
Reviewer: Daniel W Pell

Throughput (gal/hr)	Heat input capacity (MMBtu/hr)
4.3	0.59

	Pollutant						
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO
Emission factor (lb/MMBtu)	0.31	0.31	0.31	0.29	4.41	0.36	0.95
Potential emissions (tons/yr)	0.046	0.046	0.046	0.043	0.653	0.053	0.141

	HAPs							
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein	Total PAH HAPs**
Emission factor (lb/MMBtu)	9.33E-04	4.09E-04	2.85E-04	3.91E-05	1.18E-03	7.67E-04	9.25E-05	1.68E-04
Potential emissions (tons/yr)	1.38E-04	6.05E-05	4.22E-05	5.79E-06	1.75E-04	1.13E-04	1.37E-05	2.49E-05
Total HAPs (tons/yr):								0.0006

**PAH = Polyaromatic Hydrocarbon (PAHs are considered HAPs, since they are considered Polycyclic Organic Matter)



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Neal Wedding
Frontier-Kemper Constructors Incorporated
PO Box 6690
Evansville, IN 47719-0690

DATE: April 9, 2015

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

SUBJECT: Final Decision
MSOP
163-35585-00201

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

Mail Code 61-53

IDEM Staff	CDENNY 4/9/2015 Frontier-Kemper Constructors Incorporated 163-35585-00201 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
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1		Neal Wedding Frontier-Kemper Constructors Incorporated PO Box 6690 Evansville IN 47719-0690 (Source CAATS)										
2		Tom Kilmartin VP Contracts and Risk Frontier-Kemper Constructors Incorporated PO Box 6690 Evansville IN 47719-0690 (RO CAATS)										
3		Evansville City Council and Mayors Office 1NW MLK Blvd, Rm 302 Evansville IN 47708 (Local Official)										
4		Vanderburgh County Commissioners 1 NW MLK Blvd, Rm 305 Evansville IN 47708 (Local Official)										
5		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 (Affected Party)										
6		Vanderburgh County Health Dept. 420 Milberry Street Evansville IN 47713-1888 (Health Department)										
7		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 (Affected Party)										
8		David Boggs 216 Western Hills Dr Mt Vernon IN 47620 (Affected Party)										
9		John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
10		Harwood Baptist Church 1803 Allens Lane Evansville IN 47720 (Affected Party)										
11		Spectrum Packaging 1625 Allens Lane Evansville IN 47710 (Affected Party)										
12		City of Evansville Waterworks Department 1931 Allens Lane Evansville IN 47720 (Affected Party)										
13		Keith J Stewart 1809 Allens Lane Evansville IN 47720 (Affected Party)										
14		Custom Mechanical Construction 1609 Allens Lane Evansville IN 47710 (Affected Party)										
15												

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