



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Governor

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Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Construction and
Federally Enforceable State Operating Permit (FESOP)

for WGS Global Services, LLC in Perry County

FESOP No.: F123-36467-00030

The Indiana Department of Environmental Management (IDEM) has received an application from WGS Global Services, LLC, located at 741 McDaniel St., Troy, Indiana 47588, for a new source construction and FESOP. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow WGS Global Services, LLC to construct and operate a new stationary casting finishing facility.

The applicant intends to construct and operate new equipment that will emit air pollutants. The potential to emit of any regulated pollutants will be limited to less than the TV and PSD major threshold levels, respectively. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings are available at:

Perry County Public Library
2328 Tell St.
Tell City, IN 47586

and

IDEM Southeast Regional Office
820 West Sweet Street
Brownstown, IN 47220-9557

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you



do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number F123-36467-00030 in all correspondence.

Comments should be sent to:

Brian Wright
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-6544
Or dial directly: (317) 234-6544
Fax: (317) 232-6749 attn: Brian Wright
E-mail: Bwright1@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Brian Wright or my staff at the above address.



Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality



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DRAFT

New Source Construction and Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**WGS Global Services, LLC
741 McDaniel St.
Troy, Indiana 47588**

(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.

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions

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

Operation Permit No. F123-36467-00030	
Issued by:	Issuance Date:
Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Expiration Date:

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY 4

- A.1 General Information [326 IAC 2-8-3(b)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
- A.3 FESOP Applicability [326 IAC 2-8-2]

SECTION B GENERAL CONDITIONS 6

- B.1 Definitions [326 IAC 2-8-1]
- B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]
- B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]
- B.4 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]
- B.5 Term of Conditions [326 IAC 2-1.1-9.5]
- B.6 Enforceability [326 IAC 2-8-6] [IC 13-17-12]
- B.7 Severability [326 IAC 2-8-4(4)]
- B.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
- B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]
- B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]
- B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
- B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]
- B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]
- B.14 Emergency Provisions [326 IAC 2-8-12]
- B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]
- B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]
- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]
- B.18 Permit Renewal [326 IAC 2-8-3(h)]
- B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
- B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]
- B.21 Source Modification Requirement [326 IAC 2-8-11.1]
- B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]
- B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
- B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]
- B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

SECTION C SOURCE OPERATION CONDITIONS..... 15

Emission Limitations and Standards [326 IAC 2-8-4(1)] 15

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]
- C.2 Overall Source Limit [326 IAC 2-8]
- C.3 Opacity [326 IAC 5-1]
- C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.6 Fugitive Dust Emissions [326 IAC 6-4]
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Testing Requirements [326 IAC 2-8-4(3)]..... 17

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

Compliance Requirements [326 IAC 2-1.1-11] 17

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

Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)] 18

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]
- C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]	18
C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]	
C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]	
C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]	
C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]	
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]	20
C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]	
C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]	
Stratospheric Ozone Protection	21
C.18 Compliance with 40 CFR 82 and 326 IAC 22-1	
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS	22
Emission Limitations and Standards [326 IAC 2-8-4(1)]	22
D.1.1 FESOP and PSD Minor Limits [326 IAC 2-2][326 IAC 2-8]	
D.1.2 Particulate [326 IAC 6-3-2]	
D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]	
Compliance Determination Requirements [326 IAC 2-8-4(1)]	24
D.1.4 Particulate Control	
D.1.5 Testing Requirements [326 IAC 2-1.1-11]	
Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]	24
D.1.6 Parametric Monitoring	
D.1.7 Broken or Failed Bag Detection	
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]	25
D.1.8 Record Keeping Requirement	
CERTIFICATION	26
EMERGENCY OCCURRENCE REPORT	27
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT	29
Affidavit of Construction	31

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary casting finishing facility.

Source Address:	741 McDaniel St., Troy, Indiana 47588
General Source Phone Number:	812-619-1884
SIC Code:	3711 (Motor Vehicles and Car Bodies)
County Location:	Perry
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Four (4) BCT Spin Hanger Blasters shot blast machines, collectively identified as HB-1, approved in 2016 for construction, with a total maximum capacity of 48 tons per hour of castings and utilizing a total maximum of 312 tons per hour of steel shot abrasive, using dust collector DC-1 as control, and exhausting indoors.
- (b) One (1) Pangborn GN Tumble Blast shot blast machine, identified as TB-1, approved in 2016 for construction, with a maximum capacity of 7 tons per hour of castings and utilizing a maximum of 50.4 tons per hour of steel shot abrasive, using dust collector DC-2 as control, and exhausting indoors.
- (c) One (1) BCT Tumble Blast M34 shot blast machine, identified as TB-2, approved in 2016 for construction, with a maximum capacity of 7 tons per hour of castings and utilizing a total maximum of 50.4 tons per hour of steel shot abrasive, using dust collector DC-2 as control, and exhausting indoors.
- (d) Eight (8) 106 grinders, collectively identified as GD-1, approved in 2016 for construction, with a total maximum throughput of 24 tons per hour of castings, using dust collector DC-2 as control, and exhausting indoors.

Dust collector DC-2 is a common control for TB-1, TB-2 and GD-1.

- (e) Eight (8) 106 grinders, collectively identified as GD-2, approved in 2016 for construction, with a total maximum throughput of 24 tons per hour of castings, using dust collector DC-3 as control, and exhausting indoors.

The shot blast machines and grinders are affected sources under 40 CFR 63, Subpart XXXXXX.

- (f) One (1) natural gas-fired space heater, approved in 2016 for construction, with a maximum heat input rate of 1.2 MMBtu/hr.

A.3 FESOP Applicability [326 IAC 2-8-2]

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

SECTION B GENERAL CONDITIONS

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

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

B.2 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][326 IAC 2-8]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:

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

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

- (a) This permit, F123-36467-00030, 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 [326 IAC 2-8-6] [IC 13-17-12]

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

B.7 Severability [326 IAC 2-8-4(4)]

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

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

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

B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

B.10 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
 - (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.12 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

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

The Permittee shall implement the PMPs.

- (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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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.14 Emergency Provisions [326 IAC 2-8-12]

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

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

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

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

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

- (A) A description of the emergency;

- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

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

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

B.15 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to F123-36467-00030 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.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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

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

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

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

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

B.18 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

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

B.19 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

B.20 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

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

and

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

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

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

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

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

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

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

B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

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

B.25 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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

notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval 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 180 days from the date on which this source commences operation.

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

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

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

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

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

- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

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

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

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

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
 - (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the FESOP.Records of required monitoring information include the following, where applicable:
 - (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.

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

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

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions

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

- (b) The address for report submittal is:

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

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

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Four (4) BCT Spin Hanger Blasters shot blast machines, collectively identified as HB-1, approved in 2016 for construction, with a total maximum capacity of 48 tons per hour of castings and utilizing a total maximum of 312 tons per hour of steel shot abrasive, using dust collector DC-1 as control, and exhausting indoors.
- (b) One (1) Pangborn GN Tumble Blast shot blast machine, identified as TB-1, approved in 2016 for construction, with a maximum capacity of 7 tons per hour of castings and utilizing a maximum of 50.4 tons per hour of steel shot abrasive, using dust collector DC-2 as control, and exhausting indoors.
- (c) One (1) BCT Tumble Blast M34 shot blast machine, identified as TB-2, approved in 2016 for construction, with a maximum capacity of 7 tons per hour of castings and utilizing a total maximum of 50.4 tons per hour of steel shot abrasive, using dust collector DC-2 as control, and exhausting indoors.
- (d) Eight (8) 106 grinders, collectively identified as GD-1, approved in 2016 for construction, with a total maximum throughput of 24 tons per hour of castings, using dust collector DC-2 as control, and exhausting indoors.

Dust collector DC-2 is a common control for TB-1, TB-2 and GD-1.

- (e) Eight (8) 106 grinders, collectively identified as GD-2, approved in 2016 for construction, with a total maximum throughput of 24 tons per hour of castings, using dust collector DC-3 as control, and exhausting indoors.

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

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

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

- (a) Pursuant to 326 IAC 2-8 (FESOP), and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70) not applicable, the Permittee shall comply with the following emission limitations:

Emission Unit Description	Control Device	PM ₁₀ Emission Limit (lbs/hr)	PM _{2.5} Emission Limit (lbs/hr)	Total HAP Emission Limit (lbs/hr)	Manganese Emission Limit (lbs/hr)
BCT Spin Hanger Blasters (HB-1)	DC1	8.00	8.00	3.70	1.39
34 GN Tumble Blast (TB-1)	DC2	4.38	4.38	1.25	0.47
BCT Tumble Blast M34 (TB-2)					
106 Grinders (GD-1)	DC3	5.50	5.50	0.52	0.20
106 Grinders (GD-2)					

Compliance with these limits shall limit the source-wide PM₁₀ and PM_{2.5} emissions from the entire source to less than one hundred (100) tons per 12 consecutive month period, each, any single HAP from the entire source to less than ten (10) tons per 12 consecutive month period, and total HAPs from the entire source to less than twenty-five (25) tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 2-7 (Part 70 Permits), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

- (b) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), the Permittee shall comply with the following emission limitations:

Emission Unit Description	Control Device	PM Emission Limit (lbs/hr)
BCT Spin Hanger Blasters (HB-1)	DC1	30.86
34 GN Tumble Blast (TB-1)	DC2	10.46
BCT Tumble Blast M34 (TB-2)		
106 Grinders (GD-1)	DC3	4.35
106 Grinders (GD-2)		

Compliance with these limits shall limit the source-wide PM emissions from the entire source to less than two hundred fifty (250) tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the following operations shall not exceed the pounds per hour limitations as specified in the table below when operating at the specified process weight rate:

Emission Unit Description	Control Device	Maximum Process Weight Rate (tons/hour)	326 IAC 6-3-2 Allowable Particulate Emissions (lbs/hour)
BCT Spin Hanger Blasters (HB-1)	DC1	360	65.09
34 GN Tumble Blast (TB-1)	DC2	57.4	45.87
BCT Tumble Blast M34 (TB-2)		57.4	45.87
106 Grinders (GD-1)	DC3	24	34.48
106 Grinders (GD-2)		24	34.48

The pound per hour limitations were calculated with the following equations:

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

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

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

When the process weight rate exceeds two hundred (200) tons per hour, the maximum allowable emission may exceed the emission rate derived by the equation above, provided the concentration of particulate matter in the discharge gases to the atmosphere is less than 0.10 pounds per one thousand (1,000) pounds of gases.

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

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

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.4 Particulate Control

In order to comply with Conditions D.1.1 and D.1.2, the dust collectors (DC-1, DC-2, and DC-3) for particulate control shall be in operation at all times when the associated shot blast machines (HB-1, TB-1, and TB-2) and grinders (GD-1 and GD-2) are in operation.

D.1.5 Testing Requirements [326 IAC 2-1.1-11]

- (a) In order to demonstrate the compliance status with Conditions D.1.1 and D.1.2, not later than 180 days after initial startup of the BCT Spin Hanger Blasters (HB-1), the Permittee shall perform PM, PM10, and PM2.5 testing of these units after control by dust collector DC-1 utilizing methods approved by the commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.
- (b) In order to demonstrate the compliance status with Conditions D.1.1 and D.1.2, not later than 180 days after initial startup of the 34 GN Tumble Blast (TB-1), BCT Tumble Blast M34 (TB-2), and 106 Grinders (GD-1), the Permittee shall perform PM, PM10, and PM2.5 testing of these units after control by dust collector DC-2 utilizing methods approved by the commissioner. These tests shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.
- (c) In order to demonstrate the compliance status with Conditions D.1.1(b) and D.1.2, not later than 180 days after initial startup of the 106 Grinders (GD-2), the Permittee shall perform PM testing of the 106 Grinders (GD-2) after control by dust collector DC-3 utilizing methods approved by the commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.1.6 Parametric Monitoring

The Permittee shall record the pressure drop across the dust collectors (DC-1, DC-2, and DC-3) used in conjunction with the shot blast machines (HB-1, TB-1, and TB-2) and grinders (GD-1 and GD-2), at least once per day when the shot blast machines (HB-1, TB-1, and TB-2) and grinders (GD-1 and GD-2) are in operation. When for any one reading, the pressure drop across the dust collectors is outside the normal range the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 2.0 and 8.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take a reasonable response shall be considered a deviation from this permit.

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

D.1.7 Broken or Failed Bag Detection

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

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

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

D.1.8 Record Keeping Requirement

- (a) To document the compliance status with Condition D.1.6, the Permittee shall maintain daily records of the pressure drop across the dust collectors (DC-1, DC-2, and DC-3) controlling the shot blast machines (HB-1, TB-1, and TB-2) and grinders (GD-1 and GD-2). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: WGS Global Services, LLC
Source Address: 741 McDaniel St., Troy, Indiana 47588
FESOP Permit No.: F123-36467-00030

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: WGS Global Services, LLC
Source Address: 741 McDaniel St., Troy, Indiana 47588
FESOP Permit No.: F123-36467-00030

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12 |
|--|

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Source Name: WGS Global Services, LLC
Source Address: 741 McDaniel St., Troy, Indiana 47588
FESOP Permit No.: F123-36467-00030

Months: _____ to _____ Year: _____

Page 1 of 2

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

WGS Global Services, LLC
741 McDaniel St.
Troy, Indiana 47588

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 WGS Global Services, LLC 741 McDaniel St., Troy, Indiana 47588, completed construction of the casting finishing facility on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on November 7, 2015 and as permitted pursuant to New Source Construction Permit and Federally Enforceable State Operating Permit No. F123-36467-00030, Plant ID No. 123-00030 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 a New Source Construction and
Federally Enforceable State Operating Permit (FESOP)

Source Description and Location
--

Source Name:	WGS Global Services, LLC
Source Location:	741 McDaniel St., Troy, Indiana 47588
County:	Perry
SIC Code:	3711 (Motor Vehicles and Car Bodies)
Operation Permit No.:	F123-36467-00030
Permit Reviewer:	Brian Wright

On November 6, 2015, the Office of Air Quality (OAQ) received an application from WGS Global Services, LLC related to the construction and operation of a new stationary casting finishing facility.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Perry County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Perry 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}**
Perry 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.

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

Fugitive Emissions

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

Background and Description of New Source Construction

The Office of Air Quality (OAQ) has reviewed an application, submitted by WGS Global Services, LLC on November 6, 2015 relating to the construction and operation of a new stationary casting finishing facility.

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

- (a) Four (4) BCT Spin Hanger Blasters shot blast machines, collectively identified as HB-1, approved in 2016 for construction, with a total maximum capacity of 48 tons per hour of castings and utilizing a total maximum of 312 tons per hour of steel shot abrasive, using dust collector DC-1 as control, and exhausting indoors.
- (b) One (1) Pangborn GN Tumble Blast shot blast machine, identified as TB-1, approved in 2016 for construction, with a maximum capacity of 7 tons per hour of castings and utilizing a maximum of 50.4 tons per hour of steel shot abrasive, using dust collector DC-2 as control, and exhausting indoors.
- (c) One (1) BCT Tumble Blast M34 shot blast machine, identified as TB-2, approved in 2016 for construction, with a total maximum capacity of 7 tons per hour of castings and utilizing a total maximum of 50.4 tons per hour of steel shot abrasive, using dust collector DC-2 as control, and exhausting indoors.
- (d) Eight (8) 106 grinders, collectively identified as GD-1, approved in 2016 for construction, with a total maximum throughput of 24 tons per hour of castings, using dust collector DC-2 as control, and exhausting indoors.

Dust collector DC-2 is a common control for TB-1, TB-2 and GD-1.

- (e) Eight (8) 106 grinders, collectively identified as GD-2, approved in 2016 for construction, with a total maximum throughput of 24 tons per hour of castings, using dust collector DC-3 as control, and exhausting indoors.
- (f) One (1) natural gas-fired space heater, approved in 2016 for construction, with a maximum heat input rate of 1.2 MMBtu/hr.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	4953
PM10 ⁽¹⁾	798
PM2.5 ⁽¹⁾	798
SO ₂	0.003
NO _x	0.52
VOC	0.03
CO	0.43

(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10) and particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM2.5), not particulate matter (PM), are each considered as a "regulated air pollutant".

HAPs	Potential To Emit (tons/year)
Manganese	71.32
Lead	7.93
TOTAL HAPs	79.26

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(30)) of PM10 and PM2.5 are each greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are each less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(30)) of any single HAP is greater than ten (10) tons per year and the PTE of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a New Source Construction Permit (326 IAC 2-5.1-3) and a FESOP (326 IAC 2-8), because the source will limit emissions of HAPs to less than the Title V major source threshold levels.

PTE of the Entire Source After Issuance of the FESOP

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10*	PM2.5*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
BCT Spin Hanger Blasters (HB-1)	135.17	35.04	35.04	-	-	-	-	16.21	6.09 Manganese
Pangborn GN Tumble Blaster (TB-1)	45.81	19.18	19.18	-	-	-	-	5.48	2.06 Manganese
BCT Tumble Blast M34 (TB-2)				-	-	-	-		
106 Grinders (GD-1)				-	-	-	-		
106 Grinders (GD-2)	19.05	24.09	24.09	-	-	-	-	2.28	0.88 Manganese
Natural Gas-Fired Units	0.01	0.04	0.04	0.003	0.52	0.03	0.43	0.01	0.01 Hexane
Total PTE of Entire Source	200.04	78.35	78.35	0.003	0.52	0.03	0.43	23.97	9.02 Manganese
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250		NA

*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".

(a) FESOP and PSD Minor Source Status

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

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable, the source shall comply with the emission limits listed in the table below:

Emission Unit Description	Control Device	PM Emission Limit (lbs/hr)	PM ₁₀ Emission Limit (lbs/hr)	PM _{2.5} Emission Limit (lbs/hr)	Total HAP Emission Limit (lbs/hr)	Manganese Emission Limit (lbs/hr)
BCT Spin Hanger Blasters (HB-1)	DC1	30.86	8.00	8.00	3.70	1.39
34 GN Tumble Blast (TB-1)	DC2	10.46	4.38	4.38	1.25	0.47
BCT Tumble Blast M34 (TB-2)						
106 Grinders (GD-1)	DC3	4.35	5.50	5.50	0.52	0.20
106 Grinders (GD-2)						

Compliance with these limits shall limit the source-wide PM emissions from the entire source to less than two hundred fifty (250) tons per year, PM₁₀ and PM_{2.5} emissions from the entire source to less than one hundred (100) tons per year, each, any single HAP from the entire source to less than ten (10) tons per 12 consecutive month period, and total HAPs from the entire source to less than twenty-five (25) tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 2-7 (Part 70 Permits), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable.

- (b) GHGs
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.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Ferroalloy Production Facilities, 40 CFR 60, Subpart Z (326 IAC 12), are not included in the permit, since this source does not produce ferroalloys. The source cleans and polishes casts produced at other facilities.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Ferroalloys Production: Ferromanganese and Silicomanganese, 40 CFR 63, Subpart XXX, are not included in the permit, since this source does not produce ferroalloys. The source cleans and polishes casts produced at other facilities.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Iron and Steel Foundries, 40 CFR 63, Subpart EEEEE, are not included in this permit, since the source is not an iron and steel foundry as defined by 40 CFR 63.7765. The source cleans and polishes casts produced at other facilities.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Integrated Iron and Steel Manufacturing Facilities, 40 CFR 63, Subpart FFFFF, are not included in this permit, since the source is not an integrated iron and steel manufacturing facility as defined by 40 CFR 63.7852 since the facility does not produce steel from iron ore. The source cleans and polishes casts produced at other facilities.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Iron and Steel Foundries, 40 CFR 63, Subpart ZZZZZ, are not included in this permit, since the source is not an iron and steel foundry as defined by 40 CFR 63.10906. The source cleans and polishes casts produced at other facilities.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Sources: Ferroalloys Production Facilities, 40 CFR 63, Subpart YYYYYY, are not included in the permit, since this source does not produce ferroalloys. The source cleans and polishes casts produced at other facilities.

- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Area Sources: Ferroalloys Production Facilities, 40 CFR 63, Subpart YYYYYY, are not included in the permit, since this source does not produce ferroalloys. The source cleans and polishes casts produced at other facilities.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63, Subpart XXXXXX), are not included in the permit, since the facility is not one of the nine source categories listed in 40 CFR 63.11514(a).
- (j) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
 Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
 The source is not subject to the requirements of 326 IAC 6-5, since potential fugitive particulate emissions are less than 25 tons per year.
- (h) 326 IAC 12 (New Source Performance Standards)
 See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 20 (Hazardous Air Pollutants)
 See Federal Rule Applicability Section of this TSD.

Shot Blasting Machines and Grinders

- (j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 Pursuant to 326 IAC 6-3-1(b), the requirements of 326 IAC 6-3-2 are applicable to each of the operations in the table below, since each of these operations has potential particulate emissions greater than five hundred fifty-one thousandths (0.551) pound per hour.

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the following operation shall not exceed the pounds per hour limitations as specified in the table below when operating at the specified process weight rate:

Emission Unit Description	Control Device	Maximum Process Weight Rate (tons/hour)	326 IAC 6-3-2 Allowable Particulate Emissions (lbs/hour)	Uncontrolled PTE of PM (lbs/ hour)	Controlled PTE of PM (lbs/ hour)
BCT Spin Hanger Blasters (HB-1)	DC1	360	65.09	816	16.32
34 GN Tumble Blast (TB-1)	DC2	57.4	45.87	119	2.38
BCT Tumble Blast M34 (TB-2)		57.4	45.87	119	2.38
106 Grinders (GD-1)		24	34.48	38.40	0.77
106 Grinders (GD-2)	DC3	24	34.48	38.40	2.30

The pound per hour limitations were calculated with the following equations:

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

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

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and } P = \text{process weight rate in tons per hour}$$

When the process weight rate exceeds two hundred (200) tons per hour, the maximum allowable emission may exceed the emission rate derived by the equation above, provided the concentration of particulate matter in the discharge gases to the atmosphere is less than 0.10 pounds per one thousand (1,000) pounds of gases.

The dust collectors (DC-1, DC-2, and DC-3) shall be in operation at all times the associated shot blast machines (HB-1, TB-1, and TB-2) and grinders (GD-1 and GD-2) are in operation, in order to comply with the 326 IAC 6-3-2 allowable particulate emissions rates.

Natural Gas Combustion

- (k) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heat)
 The natural gas-fired space heater is not subject to the requirements of 326 IAC 6-2 since it is not a source of indirect heat.
- (l) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
 The natural gas-fired space heater is not subject to the requirements of 326 IAC 6-3, since it is not a "manufacturing process" as defined by 326 IAC 6-3-1.5.
- (m) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
 Pursuant to 326 IAC 7-1.1-1, the natural gas-fired space heater is not subject to the requirements of 326 IAC 7-1, since it has unlimited sulfur dioxide (SO₂) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.
- (n) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
 The natural gas-fired space heater is not subject to the requirements of 326 IAC 8-1-6, since it has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

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

Emission Unit/Control	Operating Parameters	Frequency
Dust Collector (DC-1)	Pressure Drop	Once per day
Dust Collector (DC-2)	Pressure Drop	Once per day
Dust Collector (DC-3)	Pressure Drop	Once per day

These monitoring conditions are necessary because the dust collectors (DC-1, DC-2, DC-3) for the shot blast machines (HB-1, TB-1, and TB-2) and grinders (GD-1 and GD-2) must operate properly to ensure compliance with 326 IAC 2-8 (FESOP) and to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70) not applicable.

- (b) The testing requirements applicable to this source are as follows:

Testing Requirements				
Emission Unit	Control Device	Pollutant	Timeframe for Testing	Frequency of Testing
Four (4) BCT Spin Hanger Blasters (HB-1)	Dust Collector (DC-1)	PM/PM10/PM2.5 (after control)	180 days after startup	Every Five Years
34 GN Tumble Blast (TB-1), BCT Tumble Blast M34 (TB-2), and 106 Grinders (GD-1)	Dust Collector (DC-2)	PM/PM10/PM2.5 (after control)	180 days after startup	Every Five Years
106 Grinders (GD-2)	Dust Collector (DC-3)	PM (after control)	180 days after startup	Every Five Years

The emission factors for PM, PM10, and PM2.5 that were used to determine the PTE for the blasters and grinders come from EPA 140) II-A-3: "Screening Study on Cupolas and Electric

Furnaces in Gray Iron Foundries" (July 2010) and IDEM OAQ considered these as alternate emission factors.

If PM, PM10 and PM2.5 emission factors from the STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition) were used to determine the PTE for the blasters and US EPA AP 42 Section 12.13.2.4 were used for the grinders, the resulting controlled PTE for PM would be greater than 250 tons per year and controlled PM10 and PM2.5 would be greater than 100 tons per year. Therefore, the source will be required to perform the following PM, PM10, and PM2.5 stack testing:

- (1) Four (4) BCT Spin Hanger Blasters (HB-1) controlled by DC-1 (PM)
The Permittee shall perform PM, PM10, and PM2.5 testing of the four (4) BCT Spin Hanger Blasters (HB-1) after control by dust collector (DC-1) utilizing methods as approved by the Commissioner not later than one hundred and eighty (180) days in order to demonstrate compliance with the 326 IAC 6-3-2 PM limits and the PM, PM10, and PM2.5 limits that render 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) not applicable.
- (2) Four (4) BCT Spin Hanger Blasters (HB-1) and Eight (8) 106 Grinders (GD-2) controlled by DC-1 and DC-3 (PM, PM10, and PM2.5)
The Permittee shall perform PM, PM10, and PM2.5 stack testing of the 34 GN Tumble Blast (TB-1), BCT Tumble Blast M34 (TB-2), and 106 Grinders (GD-1) after control by dust collector DC-2 utilizing methods as approved by the Commissioner not later than one hundred and eighty (180) days in order to demonstrate compliance with the 326 IAC 6-3-2 PM limits and the PM, PM10, and PM2.5 limits that render 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) not applicable.
- (3) 34 GN Tumble Blast (TB-1), BCT Tumble Blast M34 (TB-2), and 106 Grinders (GD-1)
The Permittee shall perform PM stack testing of the 106 Grinders (GD-2) after control by dust collector DC-3 utilizing methods as approved by the Commissioner not later than one hundred and eighty (180) days in order to demonstrate compliance with the 326 IAC 6-3-2 PM limits and the PM limits that render 326 IAC 2-2 (PSD) not applicable.
- (4) Hazardous Air Pollutants (HAPs)
IDEM OAQ has determined that Total HAP and Manganese testing will not be required, since the percent by weight of Total HAPs and Manganese in the metal castings that are blasted and grinded at this source is sufficiently low such that compliance with the PM limits will also assure compliance with the Total HAP and Manganese limits. If at any time in the future a stack test or other type of compliance determination is determined to be necessary, the commissioner may require a stack test or other type of compliance determination to assure compliance with the Total HAP and Manganese limits.

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 November 6, 2015.

The construction and operation of this source shall be subject to the conditions of the attached proposed New Source Construction and FESOP No. F123-36467-00030. The staff recommends to the Commissioner that this New Source Construction and FESOP be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Wright 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) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.

- (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>.

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

**Company Name: WGS Global Services, LLC
Source Address: 741 McDaniel St., Troy, Indiana 47588
Permit Number: F123-36467-00030
Reviewer: Brian Wright**

Unlimited/Uncontrolled

Emission Units	Control Device	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP
BCT Spin Hanger Blasters (HB-1)	DC1	3,574	357	357	-	-	-	-	57.19	51.47 Manganese
Pangborn GN Tumble Blaster (TB-1)	DC2	521	52	52	-	-	-	-	8.34	7.51 Manganese
BCT Tumble Blast M34 (TB-2)		521	52	52	-	-	-	-	8.34	7.51 Manganese
106 Grinders (GD-1)		168	168	168	-	-	-	-	2.69	2.42 Manganese
106 Grinders (GD-2)	DC3	168	168	168	-	-	-	-	2.69	2.42 Manganese
Natural Gas-Fired Units	NA	0.01	0.04	0.04	0.003	0.52	0.03	0.43	0.01	0.01 Hexane
Totals		4953	798	798	0.003	0.52	0.03	0.43	79.26	71.32 Manganese

Unlimited/Controlled

Emission Units	Control Device	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP
BCT Spin Hanger Blasters (HB-1)	DC1	71.48	7.15	7.15	-	-	-	-	1.14	1.03 Manganese
Pangborn GN Tumble Blaster (TB-1)	DC2	10.42	1.04	1.04	-	-	-	-	0.17	0.15 Manganese
BCT Tumble Blast M34 (TB-2)		10.42	1.04	1.04	-	-	-	-	0.17	0.15 Manganese
106 Grinders (GD-1)		3.36	3.36	3.36	-	-	-	-	0.05	0.05 Manganese
106 Grinders (GD-2)	DC3	10.09	10.09	10.09	-	-	-	-	0.16	0.15 Manganese
Natural Gas-Fired Units	NA	0.01	0.04	0.04	0.003	0.52	0.03	0.43	0.01	0.01 Hexane
Totals		105.80	22.73	22.73	0.003	0.52	0.03	0.43	1.70	1.52 Manganese

Limited/Controlled

Emission Units	Control Device	PM*	PM10**	PM2.5**	SO2	NOx	VOC	CO	Total HAPs***	Single HAP***
BCT Spin Hanger Blasters (HB-1)	DC1	135.17	35.04	35.04	-	-	-	-	16.21	6.09 Manganese
Pangborn GN Tumble Blaster (TB-1)	DC2	45.81	19.18	19.18	-	-	-	-	5.48	2.06 Manganese
BCT Tumble Blast M34 (TB-2)					-	-	-	-		
106 Grinders (GD-1)					-	-	-	-		
106 Grinders (GD-2)	DC3	19.05	24.09	24.09	-	-	-	-	2.28	0.88 Manganese
Natural Gas-Fired Units	NA	0.01	0.04	0.04	0.003	0.52	0.03	0.43	0.01	0.01 Hexane
Totals		200.04	78.35	78.35	0.003	0.52	0.03	0.43	23.97	9.02 Manganese

*Limited PM emissions are based on PM limits required to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (PSD) not applicable.

**Limited PM10 and PM2.5 emissions are based on PM10 and PM2.5 limits required pursuant to 326 IAC 2-8-4 (FESOP) and in order render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

***Limited Total HAP and Single HAP emissions are based on Total HAP and Single HAP limits required pursuant to 326 IAC 2-8-4 (FESOP) and in order render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

**TSD Appendix A: Emissions Calculations
Blasting**

**Company Name: WGS Global Services, LLC
Source Address: 741 McDaniel St., Troy, Indiana 47588
Permit Number: F123-36467-00030
Reviewer: Brian Wright**

Unlimited Potential to Emit

PM/PM10/PM2.5

Unit	Throughput Castings (tons/hr)	Throughput Shot (tons/hr)	Total Throughput (tons/hr)	PM Emission Factor (lbs/ton of casting)*	PM10/PM2.5 Emission Factor (lbs/ton of casting)*	Uncontrolled PM Emissions (lbs/hr)	Uncontrolled PM10/PM2.5 Emissions (lbs/hr)	Uncontrolled PM Emissions (tons/yr)	Uncontrolled PM10/PM2.5 Emissions (tons/yr)	Control Device	Control Efficiency (%)	Controlled PM Emissions (lbs/hr)	Controlled PM10/PM2.5 Emissions (lbs/hr)	Controlled PM Emissions (tons/yr)	Controlled PM10/PM2.5 Emissions (tons/yr)
Four (4) BCT Spin Hanger Blasters (HB-1)	48	312	360	17	1.7	816	81.6	3574	357	DC1	98%	16.32	1.63	71.48	7.15
One (1) Pangborn GN Tumble Blaster (TB-1)	7	50.4	57.4	17	1.7	119	11.9	521	52	DC2	98%	2.38	0.24	10.42	1.04
One (1) BCT Tumble Blast M34 (TB-2)	7	50.4	57.4	17	1.7	119	11.9	521	52	DC2	98%	2.38	0.24	10.42	1.04
Total PTE								4,617	462					92.33	9.23

Hazardous Air Pollutants (HAPs)

Unit	Inorganic HAPs (% of PM)**	Lead (% of HAPs)**	Manganese (% of HAPs)**	Uncontrolled Total HAPs (tons/yr)	Uncontrolled Lead (tons/yr)	Uncontrolled Manganese (tons/yr)	Control Device	Control Efficiency (%)	Controlled Total HAPs (tons/yr)	Controlled Lead (tons/yr)	Controlled Manganese (tons/yr)
Four (4) BCT Spin Hanger Blasters (HB-1)	1.60%	10.00%	90.00%	57.19	5.72	51.47	DC1	98%	1.14	0.11	1.03
One (1) Pangborn GN Tumble Blaster (TB-1)	1.60%	10.00%	90.00%	8.34	0.83	7.51	DC2	98%	0.17	0.02	0.15
One (1) BCT Tumble Blast M34 (TB-2)	1.60%	10.00%	90.00%	8.34	0.83	7.51	DC2	98%	0.17	0.02	0.15
Total				73.86	7.39	66.48			1.48	0.15	1.33

Methodology:

*PM emission factor is from AP42 Table 12.10-7 (Cleaning, finishing) and FIRE Version 6.25 (Grinding/Cleaning) for Source Classification Code (SCC) 3-04-003-40 (with Emission Factor Rating of E). IDEM OAQ considers this an alternative emission factor for blasting.

PM10 emission factor is from FIRE Version 6.25 (Grinding/Cleaning) for Source Classification Code (SCC) 3-04-003-40 (with Emission Factor Rating of D)

PM2.5 assumed to be equal to PM10, since no emission factors for PM2.5 are available.

The source will be required to perform PM, PM10, and PM2.5 stack testing of all of the blasters (after control) in order to demonstrate compliance with the 326 IAC 6-3-2 PM limits and the PM, PM10, and PM2.5 limits that render 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) not applicable.

**EPA ICR Sources Iron and steel MACT Table 3, 2/23/2003. Highest value documented was 1.6% Inorganic HAP with "Vast Majority" Manganese. So assumed 90% Manganese and remainder Lead.

Process Rate of castings (tons/hr) = maximum cycle time (30 minutes)* maximum load (4000 lbs/cycle) /2000 lbs/hr, and was provided by source.

Uncontrolled PM emissions (lb/hr) = process rate (tons/hr) x emission factor PM (lb/ton)

Uncontrolled PM emissions (ton/yr) = uncontrolled PM emissions (lb/hr) x 8760 hrs/yr / 2000 lb/ton

Uncontrolled PM10 emissions (lb/hr) = process rate (tons/hr) x emission factor PM10 (lb/ton)

Uncontrolled PM10 emissions (ton/yr) = uncontrolled PM10 emissions (lb/hr) x 8760 hrs/yr / 2000 lb/ton

Uncontrolled PM2.5 emissions (lb/hr) = process rate (tons/hr) x emission factor PM2.5 (lb/ton)

Uncontrolled PM2.5 emissions (ton/yr) = uncontrolled PM2.5 emissions (lb/hr) x 8760 hrs/yr / 2000 lb/ton

Uncontrolled Total HAP (tons/yr) = uncontrolled PM emissions (tons/yr) x Inorganic HAP content (%)

Uncontrolled Single HAP (tons/yr) = uncontrolled total HAP emissions (tons/yr) x single HAP content (%)

Controlled Total HAP emissions (tons/yr) = Uncontrolled HAP emissions (tons/yr) * (1 - control efficiency (%))

Controlled Single HAP emissions (tons/yr) = Uncontrolled Single emissions (tons/yr) * (1 - control efficiency (%))

**TSD Appendix A: Emissions Calculations
Grinding**

Company Name: WGS Global Services, LLC
Source Address: 741 McDaniel St., Troy, Indiana 47588
Permit Number: F123-36467-00030
Reviewer: Brian Wright

Unlimited Potential to Emit

PM/PM10/PM2.5

Unit ID	Maximum Capacity (lbs/hr)	PM/PM10/PM2.5 Uncontrolled Emission Factor* (lbs/ton)	PM/PM10/PM2.5 Emission Rate before Controls (lbs/hr)	PM/PM10/PM2.5 Emission Rate before Controls (tons/yr)	Control Device	Control Efficiency (%)	PM/PM10/PM2.5 Emission Rate after Controls (lb/hr)	PM/PM10/PM2.5 Emission Rate after Controls (tons/yr)
Eight (8) 106 grinders (GD-1)	48,000	1.6	38.40	168.19	DC2	98.0%	0.77	3.36
Eight (8) 106 grinders (GD-2)	48,000	1.6	38.40	168.19	DC3	94.0%	2.30	10.09
Total				336				13.46

Hazardous Air Pollutants (HAPs)

Unit	Inorganic HAPs (% of PM)**	Lead (% of HAPs)**	Manganese (% of HAPs)**	Uncontrolled Total HAPs (tons/yr)	Uncontrolled Lead (tons/yr)	Uncontrolled Manganese (tons/yr)	Control Device	Control Efficiency (%)	Controlled Total HAPs (tons/yr)	Controlled Lead (tons/yr)	Controlled Manganese (tons/yr)
Eight (8) 106 grinders (GD-1)	1.60%	10.00%	90.00%	2.69	0.27	2.42	DC2	98.0%	0.05	0.01	0.05
Eight (8) 106 grinders (GD-2)	1.60%	10.00%	90.00%	2.69	0.27	2.42	DC3	94.0%	0.16	0.02	0.15
Total				5.38	0.54	4.84			0.22	0.02	0.19

Methodology:

*PM emission factor is from a journal article entitled: "An Inventory of Foundry Emissions" by Bernard S. Gutow, Modern Casting, January 1972. IDEM OAQ considers this an alternative emission factor for grinding. PM10 and PM2.5 assumed to be equal to PM, since no emission factors for PM10 or PM2.5 are available.

The Permittee shall perform PM, PM10, and PM2.5 stack testing of the 34 GN Tumble Blast (TB-1), BCT Tumble Blast M34 (TB-2), and 106 Grinders (GD-1) after control by dust collector DC-2 in order to demonstrate compliance with the 326 IAC 6-3-2 PM limits and the PM, PM10, and PM2.5 limits that render 326 IAC 2-7 (Part 70) and 326 IAC 2-2 (PSD) not applicable.

The Permittee shall perform PM stack testing of the 106 Grinders (GD-2) after control by dust collector DC-3 in order to demonstrate compliance with the 326 IAC 6-3-2 PM limits and the PM limits that render 326 IAC 2-2 (PSD) not applicable.

**EPA ICR Sources Iron and steel MACT Table 3, 2/23/2003. Highest value documented was 1.6% Inorganic HAP with "Vast Majority" Manganese. So assumed 90% Manganese and remainder Lead.

Process Rate of castings (tons/hr) = maximum cycle time * maximum capacity each grinder * number of grinders, and was provided by source.

Uncontrolled PM emissions (lb/hr) = process rate (lbs/hr) x emission factor PM (lb/ton) / (2000 lbs/ton)

Uncontrolled PM emissions (ton/yr) = uncontrolled PM emissions (lb/hr) x 8760 hrs/yr / 2000 lb/ton

Uncontrolled PM10 emissions (lb/hr) = process rate (lbs/hr) x emission factor PM10 (lb/ton) / (2000 lbs/ton)

Uncontrolled PM10 emissions (ton/yr) = uncontrolled PM10 emissions (lb/hr) x 8760 hrs/yr / 2000 lb/ton

Uncontrolled PM2.5 emissions (lb/hr) = process rate (lbs/hr) x emission factor PM2.5 (lb/ton) / (2000 lbs/ton)

Uncontrolled PM2.5 emissions (ton/yr) = uncontrolled PM2.5 emissions (lb/hr) x 8760 hrs/yr / 2000 lb/ton

Controlled emissions (ton/yr) = Uncontrolled emissions (ton/yr) x (1 - control efficiency)

Uncontrolled Total HAP (tons/yr) = uncontrolled PM emissions (tons/yr) x Inorganic HAP content (%)

Uncontrolled Single HAP (tons/yr) = uncontrolled total HAP emissions (tons/yr) x single HAP content (%)

Controlled Total HAP emissions (tons/yr) = Uncontrolled HAP emissions (tons/yr) * (1 - control efficiency (%))

Controlled Single HAP emissions (tons/yr) = Uncontrolled Single emissions (tons/yr) * (1 - control efficiency (%))

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: WGS Global Services, LLC
Source Address: 741 McDaniel St., Troy, Indiana 47588
Permit Number: F123-36467-00030
Reviewer: Brian Wright

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
1.2	1020	10.3

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Potential Emission in tons/yr	0.01	0.04	0.04	0.00	0.52	0.03	0.43

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

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

Hazardous Air Pollutants (HAPs)

HAPs - Organics						
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.1E-05	6.2E-06	3.9E-04	0.01	1.8E-05	0.01

HAPs - Metals						
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	2.6E-06	5.7E-06	7.2E-06	2.0E-06	1.1E-05	2.8E-05
					Total HAPs	0.01
					Worst HAP	0.01

Methodology is the same as above.

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

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

**TSD Appendix A: Emissions Calculations
Limited Potential to Emit**

Company Name: WGS Global Services, LLC
Source Address: 741 McDaniel St., Troy, Indiana 47588
Permit Number: F123-36467-00030
Reviewer: Brian Wright

Limited Potential to Emit (by control device)

Control Device (Emission Units Controlled)	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)	PM2.5 Emission Limit (lbs/hr)	Total HAP Limit (lbs/hr)	Manganese Limit (lbs/hr)	PM Emission Limit (tons/yr)	PM10 Emission Limit (tons/yr)	PM2.5 Emission Limit (tons/yr)	Total HAP Limit (tons/yr)	Manganese Limit (tons/yr)
DC1	30.86	8.00	8.00	3.70	1.39	135.17	35.04	35.04	16.21	6.09
BCT Spin Hanger Blasters (HB-1)										
DC2	10.46	4.38	4.38	1.25	0.47	45.81	19.18	19.18	5.48	2.06
Pangborn GN Tumble Blaster (TB-1)										
BCT Tumble Blast M34 (TB-2)										
106 Grinders (GD-1)										
DC3	4.35	5.50	5.50	0.52	0.20	19.05	24.09	24.09	2.28	0.88
106 Grinders (GD-2)										
Totals						200.03	78.31	78.31	23.96	9.02

**Appendix A: Emission Calculations
326 IAC 6-3-2 Allowable PM Emissions**

Company Name: WGS Global Services, LLC
Source Address: 741 McDaniel St., Troy, Indiana 47588
Permit Number: F123-36467-00030
Reviewer: Brian Wright

326 IAC 6-3-2 Allowable PM Emissions

Process	Unlimited Throughput (lbs/hr)	Process Weight Rate (tons/hr)	Control Device	Control Efficiency (%)	Uncontrolled PM Emissions (lbs/hr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)	Controlled PM Emissions (lbs/hr)
BCT Spin Hanger Blasters (HB-1)	720,000	360	Dust Collector DC1	98.00%	816.00	65.09	16.32
Pangborn GN Tumble Blaster (TB-1)*	100,800	50.4	Dust Collector DC2	98.00%	119.00	44.65	2.38
BCT Tumble Blast M34 (TB-2)*	100,800	50.4	Dust Collector DC2	98.00%	119.00	44.65	2.38
106 Grinders (GD-1)*	48,000	24	Dust Collector DC2	98.00%	38.4	34.48	0.77
106 Grinders (GD-2)	48,000	24	Dust Collector DC3	94.00%	38.4	34.48	2.30

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

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

where

E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

Where the process weight rate is in excess of sixty thousand (60,000) pounds per hour calculate the allowable emissions using of the equation:

$$E = 55.0 P^{0.11} - 40$$

where

E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (4/03)



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

Carol S. Comer
Commissioner

February 17, 2016

Mr. Josh Maffia
WGS Global Services
6350 Taylor Drive
Flint, MI 48507

Re: Public Notice
WGS Global Services
Permit Level: New Source FESOP
Permit Number: 123 - 36467 - 00030

Dear Mr. Maffia:

Enclosed is a copy of your draft New Source FESOP, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Perry County News in Tell City, Indiana publish the abbreviated version of the public notice no later than February 22, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Tell City Perry County Public Library, 2328 Tell Street in Tell City IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Brian Wright, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-6544 or dial (317) 234-6544.

Sincerely,

Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Governor

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Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

February 17, 2016

Perry County News
Attn: Classifieds
537 Main Street
Tell City, Indiana 47586

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for WGS Global Services, Perry County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than February 22, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: New Source FESOP
Permit Number: 123 - 36467 - 00030

Enclosure
PN Newspaper.dot 6/13/2013



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

February 17, 2016

To: Tell City Perry County Public Library 2328 Tell Street Tell City IN

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: WGS Global Services
Permit Number: 123 - 36467 - 00030

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 2/17/2016



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

February 17, 2016
WGS Global Services
123 - 36467 - 00030

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 2/17/2016

Mail Code 61-53

IDEM Staff	LPOGOST 2/17/2016 WGS Global Services LLC 123 - 36467 - 00030 draft/		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Josh Maffia WGS Global Services LLC 6350 Taylor Drive Flint MI 48507 (Source CAATS)										
2		Raymond Kolhagen Plant Manager WGS Global Services LLC 741 McDaniel Street Troy IN 47588 (RO CAATS)										
3		Perry County Health Department Courthouse Annex Cannelton IN 47520-1251 (Health Department)										
4		Mr. Ron Hendrich Schwab Corporation 4630 E St Rd 66 Cannelton IN 47520 (Affected Party)										
5		Perry County Commissioners Court House, 2219 Payne Street Tell City IN 47586 (Local Official)										
6		Tell City Perry County Public Library 2328 Tell Street Tell City IN 47586-1717 (Library)										
7		Troy Town Council P.O. Box 57 Troy IN 47588 (Local Official)										
8		Mr. Mark Wilson Evansville Courier & Press P.O. Box 268 Evansville IN 47702-0268 (Affected Party)										
9		Jim Schifo Keramida Environmental, Inc. 401 North College Indianapolis IN 46202 (Consultant)										
10		John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)										
11		Meggitt Control Systems 3 Industrial Drive Troy IN 47588 (Affected Party)										
12		Troy Utilities 330 Harrison Street Troy IN 47588 (Affected Party)										
13		Southern Indiana Resource Solutions 845 Industrial Lane Troy IN 47588 (Affected Party)										
14		Randy Kleaving Perry County Board of Commissioners 2219 Payne Street Tell City IN 47586 (Local Official)										
15												

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