



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

Michael R. Pence  
Governor

Carol S. Comer  
Commissioner

## NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a  
Federally Enforceable State Operating Permit (FESOP)  
for Galbreath, LLC in Pulaski County

FESOP Renewal No.: F131-36518-00004

The Indiana Department of Environmental Management (IDEM) has received an application from Galbreath, LLC at 480 East 150 South, Winamac, IN 46996, for a renewal of its FESOP issued on September 6, 2006. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Galbreath, LLC to continue to operate its existing source.

This draft FESOP does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

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

Pulaski County Public Library  
121 South Riverside Drive  
Winamac, IN, 46996

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 30<sup>th</sup> 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 F131-36518-00004 in all correspondence.

**Comments should be sent to:**

Tamara Havics  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for extension 2-8219  
Or dial directly: (317) 232-8219  
Fax: (317) 232-6749 attn: Tamara Havics  
E-mail: THavics@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 and the IDEM public file room on the 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

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



Jason R. Krawczyk, Section Chief  
Permits Branch  
Office of Air Quality



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Governor

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Carol S. Comer  
Commissioner

## Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Galbreath, LLC  
480 East 150 South  
Winamac, Indiana 46996**

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

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

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

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

Operation Permit No.: F131-36518-00004	
Issued by:	Issuance Date:
Jason R. Krawczyk, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary truck and trailer hoist manufacturing plant.

Source Address:	480 East 150 South, Winamac, Indiana 46996
General Source Phone Number:	574-946-6631
SIC Code:	3537 (Industrial Trucks, Tractors, Trailers, and Stackers), 3799 (Transportation Equipment, Not Elsewhere Classified)
County Location:	Pulaski
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)]

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

- (a) Two (2) surface coating paint booths, located in Plant 2 East, identified as South Booth 1a, constructed in 1968, and North Booth 1b, approved for construction in 2008, utilizing the airless method of spraying and dry filters as control, with a maximum capacity of 41.18 pounds of paint per hour and 4.24 pounds of solvents per hour, combined. Booth 1a exhausting through four existing 24" stacks and Booth 1b exhausting through one 48" stack. All five stacks exhaust outside the building.
- (b) One (1) surface coating paint booth, located in Plant 2 West, identified as Booth 2, approved for construction in 2008, utilizing the airless method of spraying and dry filters as control, exhausting to vent 2a (stack 2) outside, maximum capacity of 36.04 pounds of paint per hour and 4.5 pounds of solvents per hour.

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

---

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. The combined total heat input capacity for all insignificant activities is 10.64 MMBtu/hr. There are no boilers at this source.
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (c) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

- (2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (d) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (e) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. Three (3) parts washers, using only non-halogenated solvents.
- (g) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (h) Closed loop heating and cooling systems.
- (i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (j) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (k) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.

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

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

## SECTION B GENERAL CONDITIONS

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

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

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

---

- (a) This permit, F131-36518-00004, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

---

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

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

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

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

---

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

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

---

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

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

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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

---

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

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

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

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

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

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

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

The Permittee shall implement the PMPs.

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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- (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 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

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

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

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

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

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

(C) Corrective actions taken.

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

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

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

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

- (a) All terms and conditions of permits established prior to F131-36518-00004 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
- (2) revised, or

(3) deleted.

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

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

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

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

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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- (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 IGCM 1003

Indianapolis, Indiana 46204-2251

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

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

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

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

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

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

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

and

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

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

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

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

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

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to

whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), 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]

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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]

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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]

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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]

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- (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]**

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date. 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]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any

monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

### **Compliance Monitoring Requirements [326 IAC 2-8-4(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)]**

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- (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)]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. 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 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]**

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

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

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

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

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

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

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

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

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

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

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

- (b) The address for report submittal is:

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

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

### **Stratospheric Ozone Protection**

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

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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) Two (2) surface coating paint booths, located in Plant 2 East, identified as South Booth 1a, constructed in 1968, and North Booth 1b, approved for construction in 2008, utilizing the airless method of spraying and dry filters as control, with a maximum capacity of 41.18 pounds of paint per hour and 4.24 pounds of solvents per hour, combined. Booth 1a exhausts through four existing 24" stacks and Booth 1b exhausts through one 48" stack. All five stacks exhaust outside the building.
- (b) One (1) surface coating paint booth, located in Plant 2 West, identified as Booth 2, approved for construction in 2008, utilizing the airless method of spraying and dry filters as control, exhausting to vent 2a (stack 2) outside, maximum capacity of 36.04 pounds of paint per hour and 4.5 pounds of solvents per hour.

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

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

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

The total amount of VOC delivered to the applicators, plus VOC in cleanup solvents used, at the three (3) surface coating paint booths in Plant 2 East and Plant 2 West (Booth 1a, Booth 1b, and Booth 2) shall be limited to less than 99.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, in combination with the potential to emit VOC from all other emission units at the source, will limit the source-wide potential to emit VOC to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

#### D.1.2 HAPs Limitations [326 IAC 2-8-4][326 IAC 2-4.1]

In order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable, the Permittee shall comply with the following:

- (a) The total amount of any single HAP delivered to the applicators, plus HAP in the cleanup solvents used, at the three (3) surface coating paint booths in Plant 2 East and Plant 2 West (Booth 1a, Booth 1b, and Booth 2) shall be limited to less than 9.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The combination of HAPs delivered to the applicators, plus HAPs in cleanup solvents used, at the three (3) surface coating paint booths in Plant 2 East and Plant 2 West (Booth 1a, Booth 1b, and Booth 2) shall be limited to less than 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, in combination with the potential to emit of any single HAP and any combination of HAPs from all other emission units at the source shall limit the source-wide potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period and the potential to emit of any combination of HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable and shall render the source minor under Section 112 of the Clean Air Act.

**D.1.3 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]**

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Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators at the two (2) surface coating paint booths, identified as Booth 1b and Booth 2, shall be limited to 3.5 pounds of VOC per gallon of coating less water, for air dried coatings.

**D.1.4 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9(f)]**

---

Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:

- (a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (e) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

**D.1.5 Particulate Emission Limitations [326 IAC 6-3-2(d)]**

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Pursuant to 326 IAC 6-3-2(d), the surface coating processes shall be controlled by a dry particulate filter, washwater, or an equivalent control device operated in accordance with manufacturer's specifications.

**D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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

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

**D.1.7 Volatile Organic Compounds and Hazardous Air Pollutants (VOC and HAPs)[326 IAC 8-1-2][326 IAC 8-1-4]**

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- (a) Compliance with the VOC and HAPs content and usage limits contained in Conditions D.1.1, D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

### **D.1.8 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (vent 1 (stacks 1 through 5 at Plant 2 East) and vent 2a (stack 2 at Plant 2 West)) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
  
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

### **D.1.9 Record Keeping Requirements**

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- (a) To document the compliance status with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Conditions D.1.1 and D.1.3 and the HAP usage limits established in Condition D.1.2.
  - (1) The amount and VOC and HAP of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC, individual HAP and total HAP usage for each month; and
  - (5) The weight of VOCs, individual HAPs and total HAPs emitted for each compliance period.
  
- (b) To document the compliance status with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations and daily and monthly inspections.
  
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

### **D.1.10 Reporting Requirements**

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A quarterly summary of the information to document the compliance status with Conditions D.1.1, D.1.2 and D.1.3 shall be submitted using the reporting forms located at the end of this permit, or

their equivalent, no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report 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).

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. Three (3) parts washers, using only non-halogenated solvents.
- (g) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(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.2.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from the welding equipment shall not exceed five hundred fifty-one thousandths (0.551) pound per hour, when operating at a process weight rate of less than one hundred (100) pounds per hour.

#### D.2.2 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:

- (a) Ensure the following control equipment and operating requirements are met:
  - (1) Equip the degreaser with a cover;
  - (2) Equip the degreaser with a facility for draining cleaned parts;
  - (3) Close the degreaser cover whenever parts are not being handled in the degreaser;
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
  - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7);
  - (6) Store waste solvent only in closed containers;
  - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Ensure the following additional control equipment and operating requirements are met:
  - (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent used is insoluble in, and heavier than, water.
    - (C) A refrigerated chiller.

- (D) Carbon adsorption.
  - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
  - (3) If used, solvent spray:
    - (A) must be a solid, fluid stream; and
    - (B) shall be applied at a pressure that does not cause excessive splashing.

**D.2.3 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]**

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Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

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

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

**D.2.5 Record Keeping Requirements [326 IAC 8-3-8]**

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- (a) To document the compliance status with Condition D.2.3, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
  - (1) The name and address of the solvent supplier.
  - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
  - (3) The type of solvent purchased.
  - (4) The total volume of the solvent purchased.
  - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (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: Galbreath, LLC  
Source Address: 480 East 150 South, Winamac, Indiana 46996  
FESOP Permit No.: F131-36518-00004

**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: Galbreath, LLC  
Source Address: 480 East 150 South, Winamac, Indiana 46996  
FESOP Permit No.: F131-36518-00004

**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"><li>• 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</li><li>• 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</li></ul> |
|--|

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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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**

**FESOP Quarterly Report**

Source Name: Galbreath, LLC  
Source Address: 480 East 150 South, Winamac, Indiana 46996  
FESOP No.: F 131-22924-00004  
Facility: Three (3) surface coating paint booths in Plants 2 East and 2 West (Booth 1a, Booth 1b, and Booth 2)  
Parameter: VOC delivered to the applicators, plus VOC in cleanup solvents used  
Limit: Less than 99.0 tons per twelve (12) consecutive month period, with the compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Galbreath, LLC  
Source Address: 480 East 150 South, Winamac, Indiana 46996  
FESOP No.: F 131-22924-00004  
Facility: Three (3) surface coating paint booths in Plants 2 East and 2 West (Booth 1a, Booth 1b, and Booth 2)  
Parameter: Single HAP delivered to the applicators, plus amount of that HAP in cleanup solvents used  
Limit: Less than 9.0 tons per twelve (12) consecutive month period, total, with the compliance determined at the end of each month.

HAP: \_\_\_\_\_ QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Single HAP Usage (tons)	Single HAP Usage (tons)	Single HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Galbreath, LLC  
Source Address: 480 East 150 South, Winamac, Indiana 46996  
FESOP No.: F 131-22924-00004  
Facility: Three (3) surface coating paint booths in Plants 2 East and 2 West (Booth 1a, Booth 1b, and Booth 2)  
Parameter: Total combined HAPs delivered to the applicators, plus total combined HAPs in cleanup solvents used  
Limit: Less than 24.0 tons per twelve (12) consecutive month period, total, with the compliance determined at the end of each month.

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Total HAP Usage (tons)	Total HAP Usage (tons)	Total HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

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: Galbreath, LLC  
Source Address: 480 East 150 South, Winamac, Indiana 46996  
FESOP Permit No.: F131-36518-00004

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

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

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

**Source Background and Description**

<b>Source Name:</b>	<b>Galbreath, LLC</b>
<b>Source Location:</b>	<b>480 East 150 South, Winamac, IN 46996</b>
<b>County:</b>	<b>Pulaski</b>
<b>SIC Code:</b>	<b>3537 (Industrial Trucks, Tractors, Trailers, and Stackers), 3799 (Transportation Equipment, Not Elsewhere Classified)</b>
<b>Permit Renewal No.:</b>	<b>F131-36518-00004</b>
<b>Permit Reviewer:</b>	<b>Tamara Havics</b>

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Galbreath, LLC relating to the operation of a stationary truck and trailer hoist manufacturing plant. On November 20, 2015, Galbreath, LLC submitted an application to the OAQ requesting to renew its operating permit. Galbreath, LLC was issued its first FESOP Renewal F131-22924-00004 on September 6, 2006.

**Source Definition**

This stationary truck and trailer hoist manufacturing plant consists of two (2) plants. Plants 1 and 2 are located on contiguous properties, have the same SIC codes and are owned by one (1) company. Therefore, they are considered one (1) source. This determination was originally made in FESOP No. F131-14890-00004, issued on December 31, 2001.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units:

- (a) Two (2) surface coating paint booths, located in Plant 2 East, identified as South Booth 1a, constructed in 1968, and North Booth 1b, constructed in 2008, utilizing the airless method of spraying and dry filters as control, with a maximum capacity of 41.18 pounds of paint per hour and 4.24 pounds of solvents per hour, combined. Booth 1a exhausting through four existing 24" stacks and Booth 1b exhausting through one 48" stack. All five stacks exhaust outside the building.
- (b) One (1) surface coating paint booth, located in Plant 2 West, identified as Booth 2, constructed in 2008, utilizing the airless method of spraying and dry filters as control, exhausting to vent 2a (stack 2) outside, maximum capacity of 36.04 pounds of paint per hour and 4.5 pounds of solvents per hour.

**Emission Units and Pollution Control Equipment Removed From the Source**

The source has removed the following emission units:

- (a) Two (2) surface coating paint booths, located in Plant 2 West, identified as Booth 3a and Booth 3b, constructed in 2001, utilizing the electrostatic airless method of spraying and dry filters as control, exhausting to vent 3a and 3b, respectively, maximum capacity: 79.18 pounds of primer per hour and 71.27 pounds of finish coat per hour, combined.

The source has removed the following insignificant activity:

- (a) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

<b>Insignificant Activities</b>
---------------------------------

The source also consists of the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. There are no boilers at this source.
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (c) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
  - (2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (d) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (e) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. Three (3) parts washers, using only non-halogenated solvents.
- (g) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (h) Closed loop heating and cooling systems.
- (i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (j) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (k) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.

<b>Existing Approvals</b>
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Since the issuance of the first FESOP Renewal F131-22924-00004 on September 6, 2006, the source has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. 131-25859-00004 issued on March 6, 2008; and

- (b) Administrative Amendment No. 131-32102-00004 issued on July 23, 2012.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

<b>Enforcement Issue</b>
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There are no enforcement actions pending.

<b>Emission Calculations</b>
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See Appendix A of this document for detailed emission calculations.

<b>County Attainment Status</b>
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The source is located in Pulaski County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
<sup>1</sup> 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<sub>x</sub>) 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<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Pulaski County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) PM<sub>2.5</sub>  
Pulaski County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Other Criteria Pollutants  
Pulaski 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.

### Greenhouse Gas Emissions

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](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 GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	Less than 100
PM <sub>10</sub>	Less than 100
PM <sub>2.5</sub>	Less than 100
SO <sub>2</sub>	Less than 100
NO <sub>x</sub>	Less than 100
VOC	Greater than 100, Less than 250
CO	Less than 100
Single Highest HAP: MEK	34.45
Combined Total HAPs	38.51

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

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of VOC is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's VOC emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.
- (b) The potentials to emit (as defined in 326 IAC 2-7-1(30)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the Permittee has agreed to limit the source's single HAP emissions and total

HAP emissions below Title V levels. Therefore, the Permittee will be issued a FESOP Renewal.

**Potential to Emit After Issuance**

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM <sub>10</sub> *	PM <sub>2.5</sub> **	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Paint Booths 1a, 1b, and 2	0.57	0.57	0.57	-	-	99.00	-	24.00	9.00
Natural Gas Combustion	0.09	0.35	0.35	0.03	4.57	0.25	3.84	0.09	0.08 Hexane
<b>Insignificant Activities</b>									
Welding	0.72	0.72	0.72	-	-	-	-	0.14	0.14 Manganese
Parts Washers	-	-	-	-	-	0.58	-	-	-
<b>Total PTE of Entire Source</b>	<b>1.38</b>	<b>1.64</b>	<b>1.64</b>	<b>0.03</b>	<b>4.57</b>	<b>99.84</b>	<b>3.84</b>	<b>24.23</b>	<b>9.00</b>
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	NA
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM <sub>10</sub> and PM <sub>2.5</sub> , not particulate matter (PM), are each considered as a "regulated air pollutant". **PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .									

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**Federal Rule Applicability**

**Compliance Assurance Monitoring (CAM):**

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.

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

- (a) The requirements of the New Source Performance for Storage Vessels for Petroleum Liquids, 40 CFR 60.110, 110a, and 110b, (Subparts K, Ka, and Kb), are still not included

in the permit because the various storage tanks each have a capacity less than the applicability threshold.

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

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

- (a) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Dispensing Facilities, Subpart CCCCCC, are not included in the permit, because the source no longer has gasoline dispensing facilities.
- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, Subpart DDDDDD, are still not included in the permit, because the source is not a major source of HAP emissions and the combustion sources are not boilers or process heaters.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, Subpart HHHHHH, are not included in the permit, because the source does not use chemical strippers that contain methylene chloride (MeCl); and although it does engage in spray application of coatings to mobile equipment, the source does not spray apply coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). The source petitioned the US EPA for an exemption to this subpart pursuant to §63.11170(a)(2) and was granted an exemption by the US EPA on August 12, 2010.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources, Subpart JJJJJJ, are not included in the permit, because the source has no industrial, commercial, or institutional boilers.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, Subpart MMMM [326 IAC 20-80] are still not included in the permit for the surface coating booths because the source is not a major source of HAP emissions.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning, Subpart T are still not included in the permit for the degreasing operations, because the source uses non-halogenated cleaning solvents and it is not a major source of HAP emissions.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, Subpart XXXXXX, are not included in the permit, because the source is not primarily engaged in the operations in one of the nine source categories listed in paragraphs (a)(1) through (9) of 40 CFR 63.11514.
- (h) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

<b>State Rule Applicability - Entire Source</b>
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**326 IAC 1-6-3 (Preventive Maintenance Plan)**

The source continues to be subject to 326 IAC 1-6-3.

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

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of all attainment regulated pollutants is less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

The source is not subject to the requirements of 326 IAC 2-4.1 because the potential to emit of any single HAP is limited to less than 10 tons per year and the potential to emit any combinations of HAPs is limited to less than 25 tons per year.

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

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

**326 IAC 2-8-4 (FESOP)**

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

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

- (a) The total amount of VOC delivered to the applicators, plus VOC in cleanup solvents used, at the three (3) surface coating paint booths in Plant 2 East and Plant 2 West (Booth 1a, Booth 1b, and Booth 2) shall be limited to less than 99.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit, in combination with the potential to emit VOC from all other emission units at the source, will limit the source-wide potential to emit VOC to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

- (b) The total amount of any single HAP delivered to the applicators, plus HAP in the cleanup solvents used, at the three (3) surface coating paint booths in Plant 2 East and Plant 2 West (Booth 1a, Booth 1b, and Booth 2) shall be limited to less than 9.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The combination of HAPs delivered to the applicators, plus HAPs in cleanup solvents used, at the three (3) surface coating paint booths in Plant 2 East and Plant 2 West (Booth 1a, Booth 1b, and Booth 2) shall be limited to less than 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, in combination with the potential to emit of any single HAP and any combination of HAPs from all other emission units at the source shall limit the source-wide potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period and the potential to emit of any combination of HAPs to less

than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable and shall render the source minor under Section 112 of the Clean Air Act.

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

Pursuant to 326 IAC 5-1-2(1) (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall continue to 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.

**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.

**326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

The source is not subject to the requirements of 326 IAC 6-5, because there are no fugitive particulate emissions greater than 25 tons per year.

**326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations)**

The potential SO<sub>2</sub> emissions from each emission unit are less than twenty-five (25) tons per year and ten (10) pounds per hour, respectively. Therefore, the requirements of 326 IAC 7-1.1-2 do not apply, and are not included in this permit.

**326 IAC 12 (New Source Performance Standards)**

See Federal Rule Applicability Section of this TSD.

**326 IAC 20 (Hazardous Air Pollutants)**

See Federal Rule Applicability Section of this TSD.

<b>State Rule Applicability - Individual Facilities</b>
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*Surface coating operations:*

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

Particulate matter emissions from surface coating paint booths, identified as Booth 1a, Booth 1b, and Booth 2, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**326 IAC 8-2-9 (VOC Rules: Miscellaneous Metal Coating)**

Surface coating paint booths, identified as Booth 1b and Booth 2, are subject to 326 IAC 8-2-9 because they were constructed after July 1, 1990, have actual before control emissions greater than fifteen (15) pounds per day, and coat metal parts or products under the Standard Industrial Classification Code of major groups #33, #34, #35, #36, #37, #38, and #39.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the two (2) surface coating

paint booths, identified as Booth 1b and Booth 2, constructed after July 1, 1990, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:

- (a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
- (b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
- (c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
- (d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
- (e) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Since the one (1) surface coating paint booth, identified as Booth 1a, was constructed in 1968 and is not located in any of the specific counties listed under 326 IAC 8-2-1(a)(1), the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) do not apply.

*Degreasing operations:*

**326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements)**

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:

- (a) Ensure the following control equipment and operating requirements are met:
  - (1) Equip the degreaser with a cover.
  - (2) Equip the degreaser with a device for draining cleaned parts.
  - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
  - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
  - (6) Store waste solvent only in closed containers.
  - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

- (b) Ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent used is insoluble in, and heavier than, water.
    - (C) A refrigerated chiller.
    - (D) Carbon adsorption.
    - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
  - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
  - (3) If used, solvent spray:
    - (A) must be a solid, fluid stream; and
    - (B) shall be applied at a pressure that does not cause excessive splashing.

**326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers)**

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

- (1) The name and address of the solvent supplier.
- (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
- (3) The type of solvent purchased.
- (4) The total volume of the solvent purchased.
- (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

*Welding operations:*

**326 IAC 6-3-2 (Particulate Emission Limitations)**

The welding operations are subject to 326 IAC 6-3-2(e)(2). Based on a process weight rate of less than one hundred (100) pounds per hour, the allowable rate of emission is five hundred fifty-one thousandths (0.551) pound per hour.

### Compliance Determination and Monitoring Requirements

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

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

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

- (a) The surface coating paint booths, identified as Booth 1a, Booth 1b, and Booth 2, have applicable compliance determination conditions as specified below:
  - (1) Compliance with the VOC and HAPs content and usage limits shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
  - (2) Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

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

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (vent 1 (stacks 1 through 5 at Plant 2 East) and vent 2a (stack 2 at Plant 2 West)) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

These monitoring conditions are necessary because the filters for the surface coating paint booths, identified as Booth 1a, Booth 1b, and Booth 2, must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

## Proposed Changes

### **Section A - Source Summary**

Source description was revised.

SIC code description was updated in Section A.1 to better reflect manufacturing process.

Source Status and address were updated.

The two (2) surface coating paint booths, located in Plant 2 West, identified as Booth 3a and Booth 3b, were removed per the source.

Rule citations from the Insignificant Activities descriptions were deleted since this information is descriptive only and any rule changes would cause the permit to be inaccurate.

The Insignificant Activity, gasoline fuel transfer and dispensing operations, was removed per the source and Section A.3 was renumbered accordingly.

### **Section B - General Conditions**

Conditions were updated with the renewal permit number, language was clarified throughout, and rule citations were updated.

### **Section C - Overall Source Limit**

IDEM, OAQ has removed requirements pertaining to greenhouse gases (GHGs).

### **Section C - Stack Height**

The Stack Height provision was removed since no emissions unit has PM or SO<sub>2</sub> potential to emit (after controls) of greater than 25 tons per year. Subsequent conditions were renumbered.

### **Section C - Compliance Monitoring**

Compliance monitoring requirements were clarified.

### **Section C - Instrument Specifications**

Analog instrument range requirements were clarified.

### **Section C - Emergency Reduction Plans**

The Emergency Reduction Plan requirement was removed since the source is not subject to 326 IAC 1-5-2 because the potential to emit all criteria pollutants after issuance of this FESOP are less than one hundred (100) tons per year, each. Subsequent conditions were renumbered.

### **Section C - General Reporting Requirements**

The Permittee's responsibility with regards to record keeping was clarified.

### **Section D - Emissions Unit Operations Conditions**

The emission unit descriptions have been updated to include changes identified by the source.

### **Compliance Determination Requirements**

The rule reference was added to the subsection.

### **Condition D.1.3 - Miscellaneous Metal Coating Operations**

A limitation was added for surface coating paint booth 1b.

### **Condition D.1.7 - Volatile Organic Compounds and Hazardous Air Pollutants**

A records retention condition was added.

### **Condition D.1.9 - Record Keeping Requirements**

A requirement was added to record the reason a pressure drop reading was not taken.

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

The subsection heading was added.

**Condition D.2.1 - Particulate Emission Limitations**

Welding limitation was updated based on the less than 100 pounds per hour process weight rate.

**Original Condition D.2.2**

Cold Cleaner Degreaser Operation and Control (326 IAC 8-3-5) was deleted - rule was repealed.

**Renumbered Condition D.2.2**

Cold Cleaner Degreaser Requirements (326 IAC 8-3-2) were updated.

**Condition D.2.3**

Material Requirements for Cold Cleaner Degreasers condition was added.

**Condition D.2.4**

Preventive Maintenance Plan condition was added.

**Condition D.2.5**

Record Keeping Requirements condition was added.

**Certification Report**

Source address and heading were updated.

**Emergency Occurrence Report**

Source address and heading were updated. The word "daytime" was added to describe business hours.

**FESOP Quarterly Reports**

Source address and heading were updated and the word "month" was removed from the tables.

**Quarterly Deviation Report**

Source address and heading were updated.

Additional typographical and grammatical corrections have been made throughout the permit.

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

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

The Permittee owns and operates a stationary ~~stationary metal product fabrication process.~~ **truck and trailer hoist manufacturing plant**

Source Address:	<del>US 35 and Rossier Drive</del> <b>480 East 150 South,</b> Winamac, Indiana 46996
General Source Phone Number:	574-946-6631
SIC Code:	<b>34443537 (Industrial Trucks, Tractors, Trailers, and Stackers), 3799 (Transportation Equipment, Not Elsewhere Classified)</b>
County Location:	Pulaski
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:

....

~~(c) Two (2) surface coating paint booths, located in Plant 2 West, identified as Booth 3a and Booth 3b, constructed in 2001, utilizing the electrostatic airless method of spraying and dry filters as control, exhausting to vent 3a and vent 3b, respectively, maximum capacity: 79.18 pounds of primer per hour and 71.27 pounds of finish coat per hour, combined.~~

....

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

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....

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. **The combined total heat input capacity for all insignificant activities is 10.64 MMBtu/hr.** There are no boilers at this source.

~~(b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.~~

~~(be)~~ A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

~~(cd)~~ The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

~~(de)~~ Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

~~(ef)~~ Machining where an aqueous cutting coolant continuously floods the machining interface.

~~(gf)~~ Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. Three (3) parts washers, using only non-halogenated solvents. ~~[326 IAC 8-3-5][326 IAC 8-3-2]~~

~~(hg)~~ The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. ~~[326 IAC 6-3-2]~~

~~(hi)~~ Closed loop heating and cooling systems.

~~(ij)~~ Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

~~(jk)~~ Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

- (kl) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.

....

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

---

- (a) This permit, **F131-36518**~~131-22924~~-00004, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

....

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

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....

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ 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

....

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

---

- (a) All terms and conditions of permits established prior to **F131-36518**~~131-22924~~-00004 and issued pursuant to permitting programs approved into the state implementation plan have

....

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

---

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(~~4240~~).

....

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

---

....

- (5) The Permittee maintains records on-site ~~which document~~, 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.

....

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

---

....

- (c) The Permittee may implement ~~an~~ administrative amendment **changes** addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

....

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

---

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

- (a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), ~~and greenhouse gases (GHGs)~~, from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
  - ~~(4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub>-equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.~~
- (b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than ~~one hundred~~ **fifty (250)** tons per twelve (12) consecutive month period.

....

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

---

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

....

~~C.87~~ ~~Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]~~

---

....

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

....

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).

....

~~C. 98~~ ~~Performance Testing [326 IAC 3-6]~~

....

~~C. 409~~ ~~Compliance Requirements [326 IAC 2-1.1-11]~~

---

....

~~C.4410~~ ~~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 ~~or of initial start-up, whichever is later~~, to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated ~~not~~ later than ninety (90) days after permit issuance ~~or the date of initial start-up, whichever is later~~, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

....  
~~C.14211 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.

....  
~~C.13 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]~~

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

- ~~(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 11, 1998.~~
- ~~(b) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]~~

....  
~~C.1412 Risk Management Plan [326 IAC 2-8-4][40 CFR 68]~~

....  
~~C.1345 Response to Excursions or Exceedances [326 IAC 2-8-4][326 IAC 2-8-5]~~

....  
~~C.1446 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]~~

....  
~~C. 4715 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:**

....  
~~C.1648 General Reporting Requirements [326 IAC 2-8-4(3)(C)][326 IAC 2-1.1-11]~~

....  
~~C.1749 Compliance with 40 CFR 82 and 326 IAC 22-1~~

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Two (2) surface coating paint booths, located in Plant 2 East, identified as South Booth 1a, constructed in 1968, and North Booth 1b, approved for construction in 2008, utilizing the airless method of spraying and dry filters as control, with a maximum capacity of 41.18 pounds of paint per hour and 4.24 pounds of solvents per hour,

combined. Booth 1a exhausts through four existing 24" stacks and Booth 1b exhausts through one 48" stack. All five stacks exhaust outside the building.

- (b) One (1) surface coating paint booth, located in Plant 2 West, identified as Booth 2, approved for construction in 2008, utilizing the airless method of spraying and dry filters as control, exhausting to vent 2a (stack 2) outside, maximum capacity of 36.04 pounds of paint per hour and 4.5 pounds of solvents per hour.
- (c) ~~Two (2) surface coating paint booths, located in Plant 2 West, identified as Booth 3a and Booth 3b, constructed in 2001, utilizing the electrostatic airless method of spraying and dry filters as control, exhausting to vent 3a and vent 3b, respectively, maximum capacity: 79.18 pounds of primer per hour and 71.27 pounds of finish coat per hour, combined.~~

(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 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][~~326 IAC 2-2~~]

The total amount of VOC delivered to the applicators, plus VOC in cleanup solvents used, at the ~~five three (53)~~ **five three (53)** surface coating paint booths in Plant 2 East and Plant 2 West (Booth 1a, Booth 1b, **and** Booth 2, ~~Booth 3a and Booth 3b~~) shall be limited to less than 99.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. ~~This limit, in combination with the uncontrolled potential to emit VOC of insignificant activities, will limit the potential to emit VOC from the entire source to less than 100 tons per year and render the requirements of 326 IAC 2-7 (Part 70 Operating Permit Program) and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.~~

**Compliance with this limit, in combination with the potential to emit VOC from all other emission units at the source, will limit the source-wide potential to emit VOC to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.**

##### D.1.2 HAPs Limitations [326 IAC 2-8-4][**326 IAC 2-4.1**][40 CFR 63, Subpart M]

**In order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable, the Permittee shall comply with the following HAP emissions will be limited as follows:**

- (a) The total amount of any single HAP delivered to the applicators, plus HAP in the cleanup solvents used, at the ~~five three (53)~~ **five three (53)** surface coating paint booths in Plant 2 East and Plant 2 West (Booth 1a, Booth 1b, **and** Booth 2, ~~Booth 3a and Booth 3b~~) shall be limited to less than 9.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. ~~This limit in combination with uncontrolled single HAP from insignificant activities, will limit the potential to emit single HAP from the entire source to less than 10 tons per year.~~
- (b) The combination of HAPs delivered to the applicators, plus HAPs in cleanup solvents used, at the ~~five three (35)~~ **five three (35)** surface coating paint booths in Plant 2 East and Plant 2 West (Booth 1a, Booth 1b, **and** Booth 2, ~~Booth 3a and Booth 3b~~) shall be limited to less than 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. ~~This limit in combination with uncontrolled combined HAPs from insignificant activities, keep will limit the potential to emit combined HAPs from the entire source to less than 25 tons per year.~~

~~The above limits are necessary to render the requirements of 326 IAC 2-7 (Part 70 Operating Permit Program) and 40 CFR 63 subpart M (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) not applicable.~~

**Compliance with these limits, in combination with the potential to emit of any single HAP and any combination of HAPs from all other emission units at the source shall limit the source-wide potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period and the potential to emit of any combination of HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants) not applicable and shall render the source minor under Section 112 of the Clean Air Act.**

....

D.1.3 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators at the ~~one two~~ **(12)** surface coating paint booths, identified as **Booth 1b and Booth 2**, ~~Booth 3a and Booth 3b~~, shall be limited to 3.5 pounds of VOC per gallon of coating less water, for air dried coatings.

D.1.4 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9(f)]

Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:

- (a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

....

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

D.1.7 Volatile Organic Compounds and Hazardous Air Pollutants (VOC and HAPs)[326 IAC 8-1-2][326 IAC 8-1-4]

**(a)** Compliance with the VOC and HAPs content **and usage limits** contained in ~~e~~**Conditions** D.1.1, D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**(b) Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.**

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

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (vent 1 (stacks 1 through 5 at Plant 2 East), **and vent 2a (stack 2 at Plant 2 West)**), ~~vent 2b (stack 3 at Plant 2 West), vent 3a and vent 3b~~ while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

....

#### D.1.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1, D.1.2 and D.1.3(a) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported.

....

### SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

#### Emissions Unit Description:

(gf) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. Three (3) parts washers, using only non-halogenated solvents. ~~{326 IAC 8-3-5}~~~~[326 IAC 8-3-2]~~

(hg) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. ~~[326 IAC 6-3-2]~~

(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.2.1 Particulate Emission Limitations [326 IAC 6-3-2]

~~The welding operations are subject to~~**Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from the welding equipment shall not exceed five hundred fifty-one thousandths (0.551) pound per hour, when operating at a process weight rate of less than one hundred (100) pounds per hour.**

~~Based on a process weight rate of 0.015 tons per hour, the particulate emissions shall not exceed 0.25 pounds per hour.~~

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

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

##### D.2.2 Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-5]

~~(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:~~

~~(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:~~

~~(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));~~

~~(B) The solvent is agitated; or~~

~~(C) The solvent is heated.~~

~~(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32)~~

~~millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.~~

- ~~(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).~~
- ~~(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.~~
- ~~(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
  - ~~(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.~~
  - ~~(B) A water cover when solvent is used is insoluble in, and heavier than, water.~~
  - ~~(C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.~~~~
- ~~(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
  - ~~(1) Close the cover whenever articles are not being handled in the degreaser.~~
  - ~~(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.~~
  - ~~(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.~~~~

**D.2.32 Cold Cleaner Degreaser Control Equipment and Operating Requirements** [326 IAC 8-3-2]

**Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:**

~~Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:~~

- (a) Ensure the following control equipment and operating requirements are met:**
  - ~~(a1) Equip the cleaner degreaser with a cover;~~
  - ~~(2b) Equip the cleaner degreaser with a facility for draining cleaned parts;~~

- (3e) Close the degreaser cover whenever parts are not being handled in the ~~degreaser cleaner~~;
  - (4d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
  - (5e) Provide a permanent, conspicuous label **that lists the operating requirements in subdivisions (3), (4), (6), and (7)**; ~~summarizing the operation requirements~~;
  - (6f) Store waste solvent only in ~~covered~~ **closed** containers;
  - (7) **Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.** ~~and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.~~
- (b) **Ensure the following additional control equipment and operating requirements are met:**
- (1) **Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):**
    - (A) **A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.**
    - (B) **A water cover when solvent used is insoluble in, and heavier than, water.**
    - (C) **A refrigerated chiller.**
    - (D) **Carbon adsorption.**
    - (E) **An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.**
  - (2) **Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.**
  - (3) **If used, solvent spray:**
    - (A) **must be a solid, fluid stream; and**
    - (B) **shall be applied at a pressure that does not cause excessive splashing.**

#### **D.2.3 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]**

---

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

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

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

**D.2.5 Record Keeping Requirements [326 IAC 8-3-8]**

- (a) To document the compliance status with Condition D.2.3, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
- (1) The name and address of the solvent supplier.
  - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
  - (3) The type of solvent purchased.
  - (4) The total volume of the solvent purchased.
  - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (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 Address: ~~U.S. 35 and Rosser Drive~~ **480 East 150 South**, Winamac, Indiana 46996

....

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

....

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT

Source Name: Galbreath, LLC  
Source Address: ~~U.S. 35 and Rosser Drive~~ **480 East 150 South**, Winamac, Indiana 46996  
FESOP Permit No.: F131-36518-00004

....

- |   |
|---|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) <b>daytime</b> business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• 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</li></ul> |
|---|

....

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

FESOP Quarterly Report

Source Name: Galbreath, LLC  
 Source Address: ~~U.S. 35 and Rosser Drive~~ **480 East 150 South**, Winamac, Indiana 46996  
 FESOP No.: F 131-22924-00004  
 Facility: ~~Five Three (35)~~ **Five Three (35)** surface coating paint booths in Plants 2 East and 2 West (Booth 1a, Booth 1b, **and** Booth 2, ~~Booth 3a and Booth 3b~~)

....

QUARTER:      YEAR:

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total
<del>Month 1</del>			
<del>Month 2</del>			
<del>Month 3</del>			

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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: Galbreath, LLC  
 Source Address: ~~U.S. 35 and Rosser Drive~~ **480 East 150 South**, Winamac, Indiana 46996  
 FESOP Permit No.: F131-36518-00004

**Recommendation**

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

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

An application for the purposes of this review was received on November 20, 2015. Additional information was received on February 18, 2016.

**Conclusion**

The operation of this stationary truck and trailer hoist manufacturing plant shall be subject to the conditions of the attached FESOP Renewal No. F131-36518-00004.

<b>IDEM Contact</b>
---------------------

- (a) Questions regarding this proposed permit can be directed to Tamara Havics at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 232-8219 or toll free at 1-800-451-6027 extension 2-8219.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations  
Source Summary**

Company Name: Galbreath, LLC  
 Address City IN Zip: 480 East 150 South, Winamac, Indiana 46996  
 FESOP Renewal No.: F131-36518-00004  
 Reviewer: Tamara Havics

**Unlimited PTE (tons/yr)**

Process	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Single HAPs	
Paint Booths 1a, 1b, and 2	57.45	57.45	57.45	-	-	184.79	-	38.28	34.45	MEK
Natural Gas Combustion	0.09	0.35	0.35	0.03	4.57	0.25	3.84	0.09	0.08	Hexane
Welding	0.72	0.72	0.72	-	-	-	-	0.14	0.14	Manganese
Parts Washers	-	-	-	-	-	0.58	-	-	-	-
Roadway fugitives*	4.65	1.15	0.16	-	-	-	-	-	-	-
<b>Total</b>	<b>58.26</b>	<b>58.52</b>	<b>58.52</b>	<b>0.03</b>	<b>4.57</b>	<b>185.63</b>	<b>3.84</b>	<b>38.51</b>	<b>34.45</b>	<b>MEK</b>

\*Fugitive emissions are not included towards the determination of PSD, emission offset, and Part 70 Permit applicability.

**Limited PTE (tons/yr)**

Process	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Single HAPs	
Paint Booths 1a, 1b, and 2	0.57	0.57	0.57	-	-	99.00	-	24.00	9.00	-
Natural Gas Combustion	0.09	0.35	0.35	0.03	4.57	0.25	3.84	0.09	0.08	Hexane
Welding	0.72	0.72	0.72	-	-	-	-	0.14	0.14	Manganese
Parts Washers	-	-	-	-	-	0.58	-	-	-	-
Roadway fugitives*	4.65	1.15	0.16	-	-	-	-	-	-	-
<b>Total</b>	<b>1.38</b>	<b>1.64</b>	<b>1.64</b>	<b>0.03</b>	<b>4.57</b>	<b>99.84</b>	<b>3.84</b>	<b>24.23</b>	<b>9.00</b>	

\*Fugitive emissions are not included towards the determination of PSD, emission offset, and Part 70 Permit applicability.

**Appendix A: Emissions Calculations  
VOC and Particulate  
Surface Coating Operations**

**Company Name:** Galbreath, LLC  
**Address City IN Zip:** 480 East 150 South, Winamac, Indiana 46996  
**FESOP Renewal No.:** F131-36518-00004  
**Reviewer:** Tamara Havics

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Material Usage (lbs/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
<b>Booth1a and Booth 1b</b>															
Red Oxide Primer	10.92	32.05%	0.0%	32.1%	0.0%	47.00%	41.18	3.50	3.50	13.20	316.77	57.81	30.64	7.45	75%
Brown H/S Hap Free Enamel	8.34	41.97%	0.0%	42.0%	0.0%	55.30%	41.18	3.50	3.50	17.28	414.76	75.69	26.17	6.33	75%
Red H/S HAP-Free Acrylic Enamel	8.08	43.32%	0.0%	43.3%	0.0%	61.50%	41.18	3.50	3.50	17.84	428.11	78.13	25.56	5.69	75%
Beige H/S HAP-Free Enamel	8.68	40.32%	0.0%	40.3%	0.0%	49.90%	41.18	3.50	3.50	16.60	398.52	72.73	26.91	7.01	75%
Worst Case Solvent (Aromatic 100)	7.34	100.00%	0.0%	100.0%	0.0%	0.00%	4.24	7.34	7.34	4.24	101.76	18.57	0.00	n/a	75%
<b>Booth 2</b>															
Red Oxide Primer	10.92	32.05%	0.0%	32.1%	0.0%	47.00%	36.04	3.50	3.50	11.55	277.23	50.59	26.82	7.45	75%
Brown H/S Hap Free Enamel	8.34	41.97%	0.0%	42.0%	0.0%	55.30%	36.04	3.50	3.50	15.12	362.99	66.25	22.90	6.33	75%
Red H/S HAP-Free Acrylic Enamel	8.08	43.32%	0.0%	43.3%	0.0%	61.50%	36.04	3.50	3.50	15.61	374.67	68.38	22.37	5.69	75%
Beige H/S HAP-Free Enamel	8.68	40.32%	0.0%	40.3%	0.0%	49.90%	36.04	3.50	3.50	14.53	348.77	63.65	23.55	7.01	75%
Worst Case Solvent (Aromatic 100)	7.34	100.00%	0.0%	100.0%	0.0%	0.00%	4.50	7.34	7.34	4.50	108.00	19.71	0.00	n/a	75%
<b>Potential Emissions</b>										<b>42.19</b>	<b>1012.54</b>	<b>184.79</b>	<b>57.45</b>		
<b>Uncontrolled</b>										<b>42.19</b>	<b>1012.54</b>	<b>184.79</b>	<b>57.45</b>		
<b>Controlled</b>															

**NOTE**  
PM Control Efficiency = 99.00%

**METHODOLOGY**  
 Pounds of VOC per Gallon Coating less Water provided by the coating supplier.  
 Potential VOC Pounds per Hour = Material Usage (lbs/hr) x Weight % Organics  
 Potential VOC Pounds per Day = Material Usage (lbs/hr) x Weight % Organics x 24 hrs/day  
 Potential VOC Tons per Year = Material Usage (lbs/hr) x Weight % Organics x 8,760 hrs/yr x 1 ton/2,000 lbs  
 Particulate Potential Tons per Year = Material Usage (lbs/hr) x (1 - Weight % Organics) x 8,760 hrs/yr x 1 ton/2,000 lbs  
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
 Total = Worst Coating + Worst Case Solvent

**Appendix A: Emissions Calculations  
HAPs Emissions  
Surface Coating Operations**

Company Name: Galbreath, LLC  
Address City IN Zip: 480 East 150 South, Winamac, Indiana 46996  
FESOP Renewal No.: F131-36518-00004  
Reviewer: Tamara Havics

Material	Density (lbs/gal)	Max Usage* (lbs/hr)	Weight % Xylene	Weight % Toluene	Weight % Mek	Weight % MIBK	Weight % Ethyl Benzene	Weight % Methanol	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MEK Emissions (tons/yr)	MIBK Emissions (tons/yr)	Ethyl Benzene Emissions (tons/yr)	Methanol Emissions (tons/yr)	Total HAP emissions (tons/yr)
<b>Solvents</b>															
VM&P Naptha (67-55)	6.17	8.74	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Acetone	6.59	8.74	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Xylene (94)	7.25	8.74	85.00%	0.00%	0.00%	0.00%	15.00%	0.00%	32.54	0.00	0.00	0.00	0.00	5.74	38.28
Lacquer Thinner	7.07	8.74	70.00%	11.00%	0.00%	0.00%	0.00%	0.00%	26.80	4.21	0.00	0.00	0.00	0.00	31.01
Aromatic 100	7.34	8.74	1.00%	0.00%	90.00%	0.00%	1.00%	0.00%	0.38	0.00	34.45	0.00	0.38	0.00	35.22
Laq Th 11-155-1	7.00	8.74	0.00%	60.00%	10.00%	0.00%	0.00%	20.00%	0.00	22.97	3.83	0.00	0.00	7.66	34.45
Solvent 100	7.26	8.74	4.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.53	0.00	0.00	0.00	0.00	0.00	1.53
VM&P Naptha (66733)	6.26	8.74	7.00%	0.00%	0.00%	10.00%	1.00%	0.00%	2.68	0.00	0.00	3.83	0.38	0.00	6.89
Xylene (66800)	7.18	8.74	80.00%	0.00%	0.00%	0.00%	20.00%	0.00%	30.62	0.00	0.00	0.00	7.66	0.00	38.28

\*Booth 1a and 1b have maximum capacity of 4.24 pounds of solvents per hour, combined. Booth 2 has maximum capacity 4.5 pounds of solvents per hour.

tons/year = Max Usage (lbs/hr) x Weight % x 8760 hrs/year x 1 ton / 2000 lbs

<b>Combined Total Single Highest</b>	<b>38.28</b>
<b>MEK</b>	<b>34.45</b>

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

**Company Name: Galbreath, LLC  
Address City IN Zip: 480 East 150 South, Winamac, Indiana 46996  
FESOP Renewal No.: F131-36518-00004  
Reviewer: Tamara Havics**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
10.64	1020	91.38

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.09	0.35	0.35	0.03	4.57	0.25	3.84

\*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 Pollutant Emissions**

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	9.595E-05	5.483E-05	3.427E-03	8.224E-02	1.553E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.284E-05	5.026E-05	6.397E-05	1.736E-05	9.595E-05

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.

**Total HAP (ton/yr) 8.6E-02**  
**Single HAP (ton/yr) 8.2E-02 hexane**

**Appendix A: Emissions Calculations**  
Welding

Company Name: Galbreath, LLC  
 Address City IN Zip: 480 East 150 South, Winamac, Indiana 46996  
 FESOP Renewal No.: F131-36518-00004  
 Reviewer: Tamara Havics

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10*	Mn	Ni	Cr	
WELDING											
Metal Inert Gas (MIG)(carbon steel) GMAW	1	30.28	0.0054	0.000346	0.000184	0.000524	0.164	0.01048	0.006	0.01586672	0.032
<b>EMISSION TOTALS</b>											
Potential Emissions lbs/hr							0.16				0.03
Potential Emissions tons/year							<b>0.72</b>				<b>0.14</b>

**METHODOLOGY**

\* In the absence of valid PM2.5 emission factors, it is assumed that PM2.5 emissions = PM10 emissions  
 Emission factors are from AP 42-12: Electric Arc Welding, Tables 12.19-1 and 12.19-2, (01/95).  
 Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)  
 Emissions, tons/yr = emissions, lb/hr x 1 ton/2,000 lbs x 8760 hr/yr

VOC emissions

Parts Washers

Company Name: Galbreath, LLC  
 Address City IN Zip: 480 East 150 South, Winamac, Indiana 46996  
 FESOP Renewal No.: F131-36518-00004  
 Reviewer: Tamara Havics

Station	Capacity (gallons)	Turnovers per year	Density (lb/gal)	wt% VOC	Potential VOC emissions (ton/year)
1	17	4	6.80	100%	0.23
2	17	4	6.80	100%	0.23
3	9	4	6.80	100%	0.12
<b>Total</b>					<b>0.58</b>

**Methodology:**

VOC emissions (tons/yr) = Capacity (gallons) x Turnovers/year x Density (lbs/gal) x Weight % VOC x 1 ton/2000lbs

**Appendix A: Emission Calculations  
Fugitive Dust Emissions - Unpaved Roads**

**Company Name: Galbreath, LLC  
Address City IN Zip: 480 East 150 South, Winamac, Indiana 46996  
FESOP Renewal No.: F131-36518-00004  
Reviewer: Tamara Havics**

**Unpaved Roads at Industrial Site**

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one way distance (feet/trip)	Maximum one way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Trucks (entering plant) (one-way trip)	3.0	1.0	3.0	20.0	60.0	1320	0.250	0.8	273.8
Trucks (leaving plant) (one-way trip)	3.0	1.0	3.0	20.0	60.0	1320	0.250	0.8	273.8
Cars (entering plant) (one-way trip)	10.0	1.0	10.0	2.0	20.0	1320	0.250	2.5	912.5
Cars (leaving plant) (one-way trip)	10.0	1.0	10.0	2.0	20.0	1320	0.250	2.5	912.5
<b>Totals</b>			<b>26.0</b>		<b>160.0</b>			<b>6.5</b>	<b>2372.5</b>

Average Vehicle Weight Per Trip =  tons/trip  
Average Miles Per Trip =  miles/trip

Unmitigated Emission Factor,  $E_f = k * [(s/12)^a] * [(W/3)^b]$  (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	6.0	6.0	6.0	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	6.2	6.2	6.2	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E * [(365 - P)/365]$  (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor,  $E_{ext} = E * [(365 - P)/365]$   
where P =  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	4.17	1.11	0.11	lb/mile
Mitigated Emission Factor, $E_{ext} =$	2.74	0.73	0.07	lb/mile
Dust Control Efficiency =	0%	0%	0%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Trucks (entering plant) (one-way trip)	0.57	0.15	0.02	0.38	0.10	0.01	0.38	0.10	0.01
Trucks (leaving plant) (one-way trip)	0.57	0.15	0.02	0.38	0.10	0.01	0.38	0.10	0.01
Cars (entering plant) (one-way trip)	1.90	0.51	0.05	1.25	0.33	0.03	1.25	0.33	0.03
Cars (leaving plant) (one-way trip)	1.90	0.51	0.05	1.25	0.33	0.03	1.25	0.33	0.03
<b>Totals</b>	<b>4.94</b>	<b>1.32</b>	<b>0.13</b>	<b>3.25</b>	<b>0.87</b>	<b>0.09</b>	<b>3.25</b>	<b>0.87</b>	<b>0.09</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) \* (Unmitigated Emission Factor (lb/mile)) \* (ton/2000 lbs)  
Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) \* (Mitigated Emission Factor (lb/mile)) \* (ton/2000 lbs)  
Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) \* (1 - Dust Control Efficiency)

**Abbreviations**

PM = Particulate Matter  
PM10 = Particulate Matter (<10 um)  
PM2.5 = Particulate Matter (<2.5 um)  
PTE = Potential to Emit

**Appendix A: Emission Calculations  
Fugitive Dust Emissions - Paved Roads**

**Company Name: Galbreath, LLC  
Address City IN Zip: 480 East 150 South, Winamac, Indiana 46996  
FESOP Renewal No.: F131-36518-00004  
Reviewer: Tamara Havics**

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

**Vehicle Information (provided by source)**

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Trucks (entering plant) (one-way trip)	2.0	1.0	2.0	10.0	20.0	1320	0.250	0.5	182.5
Trucks (leaving plant) (one-way trip)	4.0	1.0	4.0	10.0	40.0	1320	0.250	1.0	365.0
Cars (entering plant) (one-way trip)	80.0	1.0	80.0	2.0	160.0	1320	0.250	20.0	7300.0
Cars (leaving plant) (one-way trip)	80.0	1.0	80.0	2.0	160.0	1320	0.250	20.0	7300.0
<b>Totals</b>			<b>166.0</b>		<b>380.0</b>			<b>41.5</b>	<b>15147.5</b>

Average Vehicle Weight Per Trip =  tons/trip  
Average Miles Per Trip =  miles/trip

Unmitigated Emission Factor,  $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$  (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	2.3	2.3	2.3	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m <sup>2</sup> = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E * [1 - (p/4N)]$  (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$   
where p =  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
N =  days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	0.202	0.040	0.0099	lb/mile
Mitigated Emission Factor, $E_{ext} =$	0.185	0.037	0.0091	lb/mile
Dust Control Efficiency =	0%	0%	0%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Trucks (entering plant) (one-way trip)	0.02	0.00	0.00	0.02	0.00	0.00	0.02	0.00	0.00
Trucks (leaving plant) (one-way trip)	0.04	0.01	0.00	0.03	0.01	0.00	0.03	0.01	0.00
Cars (entering plant) (one-way trip)	0.74	0.15	0.04	0.68	0.14	0.03	0.68	0.14	0.03
Cars (leaving plant) (one-way trip)	0.74	0.15	0.04	0.68	0.14	0.03	0.68	0.14	0.03
<b>Totals</b>	<b>1.53</b>	<b>0.31</b>	<b>0.08</b>	<b>1.40</b>	<b>0.28</b>	<b>0.07</b>	<b>1.40</b>	<b>0.28</b>	<b>0.07</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] \* [Maximum one-way distance (mi/trip)]  
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]  
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

PM = Particulate Matter  
PM10 = Particulate Matter (<10 um)  
PM2.5 = Particle Matter (<2.5 um)  
PTE = Potential to Emit



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

May 6, 2016

Charles Kleinfehn  
Galbreath LLC  
480 E 150 S  
Winamac, IN 46996

Re: Public Notice  
Galbreath LLC  
Permit Level: FESOP - Renewal  
Permit Number: 131 - 36518 - 00004

Dear Charles Kleinfehn:

Enclosed is a copy of your draft FESOP - Renewal, 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 Pulaski County Journal in Winamac, Indiana publish the abbreviated version of the public notice no later than May 11, 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 Pulaski Co Public Library, 121 S Riverside Dr in Winamac 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 Tamara Havics, 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 2-8219 or dial (317) 232-8219.

Sincerely,

*Len Pogost*

Len Pogost  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover letter 2/17/2016



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Commissioner

## **ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING**

May 5, 2016

Pulaski County Journal  
Attn: Classifieds  
P.O. Box 19  
Winamac, Indiana 46996

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Galbreath LLC, Pulaski 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 May 11, 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: FESOP - Renewal  
Permit Number: 131 - 36518 - 00004

Enclosure  
PN Newspaper.dot 6/13/2013



# Indiana Department of Environmental Management

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**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

May 6, 2016

To: Pulaski Co Public Library 121 S Riverside Dr Winamac 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: Galbreath LLC**  
**Permit Number: 131 - 36518 - 00004**

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 2/16/2016



# Indiana Department of Environmental Management

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(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Michael R. Pence**  
Governor

**Carol S. Comer**  
Commissioner

## Notice of Public Comment

**May 6, 2016**  
**Galbreath LLC**  
**131 - 36518 - 00004**

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](mailto: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 5/5/2016 Galbreath LLC 131 - 36518 - 00004 draft		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	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		

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		Charles Kleinfehn Galbreath LLC 480 E 150 S Winamac IN 46996 (Source CAATS)									
2		Chad Cook General Manager Galbreath LLC 480 E 150 S Winamac IN 46996 (RO CAATS)									
3		Francesville Town Council PO Box 616, 100 North Brooks Francesville IN 47946 (Local Official)									
4		Mr. Gary Hanner Hanner Hanner & Hanner P.O. Box 122 Rockville IN 47872 (Affected Party)									
5		Pulaski County Commissioners 112 East Main Street, Rm 200 Winamac IN 46996 (Local Official)									
6		Winamac Town Council and Town Manager 120 West Main Street Winamac IN 46996 (Local Official)									
7		Pulaski County Health Department 125 S. Riverside Dr, County Bldg, Suite 205 Winamac IN 46996-1528 (Health Department)									
8		Pulaski Co Public Library 121 S Riverside Dr Winamac IN 46996-1596 (Library)									
9		Mr. Charles Klienfehn Galbreath, Inc. P.O. Box 220 Winamac IN 46996 (Source ? addl contact)									
10											
11											
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13											
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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