



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Modification to a
Part 70 Operating Permit

for Jeffboat, LLC in Clark County

Significant Permit Modification No.: 019-36951-00006

The Indiana Department of Environmental Management (IDEM) has received an application from Jeffboat, LLC, located at 1030 East Market Street, Jeffersonville, Indiana 47130, for a significant modification of its Part 70 Operating Permit issued on December 5, 2011. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Jeffboat, LLC to make certain changes at its existing source. Jeffboat, LLC has applied to add one (1) cartridge-type dust collector which will be housed in the blast building. The reason for the addition of this unit is to create an alternative operating scenario which will periodically allow Jeffboat to use one (1) outdoor blast unit (EU-06a) at a time, inside the blast building, with the dust collector as control and exhausting through a stack.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

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

Jeffersonville Township Public Library
211 East Court Avenue
Jeffersonville, Indiana 47130

and

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

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

How can you participate in this process?

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

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will

make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to Significant Permit Modification (SPM) No.: 019-36951-00006 in all correspondence.

Comments should be sent to:

Deborah Cole
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-5377
Or dial directly: (317) 234-5377
Fax: (317) 232-6749 attn: Deborah Cole
E-mail: dcole@idem.IN.gov

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

What will happen after IDEM makes a decision?

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

If you have any questions, please contact Deborah Cole of my staff at the above address.


Iryn Callung, Section Chief
Permits Branch
Office of Air Quality



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DRAFT

Mr. Will Tucker, Corporate Environmental Manager
Jeffboat, LLC
1030 East Market Street
Jeffersonville, IN 47130

Re: 019-36951-00006
Significant Permit Modification to
Part 70 Renewal No.: T019-29304-00006

Dear Mr. Tucker:

Jeffboat, LLC was issued Part 70 Operating Permit Renewal No. T019-29304-00006 on December 5, 2011 for a stationary ship building and repair facility located at 1030 East Market Street, Jeffersonville, Indiana 47130. An application requesting changes to this permit was received on September 10, 2015. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachments. Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:

Attachment A: Fugitive Particulate Matter Control Plan

Attachment B: 40 CFR 63, Subpart II, National Emissions Standards for Shipbuilding and Ship Repair (Surface Coating)

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

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

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

DRAFT

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Deborah Cole, of my staff, at 317-234-5377 or 1-800-451-6027, ext. 4-5377.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit, Technical Support Document and Appendix A

cc: File - Clark County
Clark County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Southeast Regional Office



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

Jeffboat, LLC
1030 East Market Street
Jeffersonville, Indiana 47130

(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. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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 2-7 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.

Operation Permit No.: T019-29304-00006	
Issued by: <i>Original Signed by:</i> Donald F. Robin, P.E., Section Chief Permits Branch Office of Air Quality	Issuance Date: December 5, 2011 Expiration Date: December 5, 2016

Significant Permit Modification No.: 019-34921-00006, issued on December 8, 2014

Significant Permit Modification No.: 019-36951-00006	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: December 5, 2016

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Attachment A: Fugitive Particulate Matter Control Plan		
Attachment B: 40 CFR 63, Subpart II - National Emission Standards for Shipbuilding and Ship Repair (Surface Coating)		

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 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary ship building and repair facility.

Source Address:	1030 East Market Street, Jeffersonville, Indiana 47130
General Source Phone Number:	(812) 288-1640
SIC Code:	3731 (Ship Building and Repairing)
County Location:	Clark
Source Location Status:	Nonattainment for PM _{2.5} standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source under PSD, Nonattainment NSR, and Emission Offset Rules Major 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 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

- (a) Indoor shot blasting operations, identified as EU-01, with a maximum capacity of 600 marine vessels per year, consisting of:
 - (1) One (1) shot blast unit, known as Pangborn (No. 1), constructed in 1980, with a maximum airflow of 13,000 acfm, using steel shot, and exhausting to a baghouse dust collector identified as BH1.
 - (2) One (1) shot blast unit, known as Wheelabrator (No. 2), constructed in 1970, with a maximum airflow of 12,000 acfm, using steel shot, and exhausting to a baghouse dust collector identified as BH2.
- (b) Surface coating operations consisting of the following:
 - (1) Two (2) spray booths, identified as EU-02, for the application of weld-through (shop) primer when performing shipbuilding, with a maximum capacity of 600 marine vessels per year, with emissions controlled by paint arrestor pads, identified as PA1 and PA2. Unit No. 1 was constructed in 1980. Unit No. 2 was constructed in 1970. Under 40 CFR 63, Subpart II, this is considered shipbuilding and repair.
 - (2) Outdoor spray operations, identified as EU-03, constructed in 1939, consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications, with a maximum capacity of 600 marine vessels per year. A portion of the outdoor spray operations are conducted under cover that was installed in 2006. Under 40 CFR 63, Subpart II, this is considered shipbuilding and repair.

- (c) Welding operations, identified as EU-04, occurring outside and under a structure, for the construction of marine vessels from sheet steel, constructed in 1939, with a maximum capacity of 600 marine vessels per year, and with emissions uncontrolled and exhausted to the atmosphere.
- (d) Flame and plasma cutting operations, identified as EU-05, occurring outside and under a structure, for the construction of marine vessels from sheet steel, with flame cutting operations installed in 1939 and plasma cutting operations installed in 1990, with a maximum capacity of 600 marine vessels per year, and with emissions uncontrolled and exhausted to the atmosphere.
- (e) Four (4) abrasive outdoor blasting units for the outdoor maintenance and construction of marine vessels, collectively identified as EU-06, constructed in 2002, and approved for modification in 2016 to operate one blasting unit inside the blast building, with a maximum capacity of 4,000 pounds (2.0 tons) of grit or sand per hour, with emissions controlled by dust suppressant and exhausted to the atmosphere.

Any one of these four (4) blasting units is approved in 2016 to operate inside the blast building for maintenance and construction of marine vessels, with a maximum capacity of 1,000 pounds (0.5 tons) of grit or sand per hour, with its own cartridge-type dust collector and exhausting to a single stack to the atmosphere. While operating inside the blast building, this unit will be identified as EU-06a.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

- (a) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
[326 IAC 6-5]
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including the following:
 - (1) Two (2) natural gas-fired water-dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
 - (2) Two (2) natural gas fired pre-dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
 - (3) Two (2) natural gas fired dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
 - (4) Two (2) natural gas fired furnaces, with a maximum heat input capacity of 3.0 MMBtu/hr. [326 IAC 6.5-1]
- (c) 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. [326 IAC 8-4-6]
- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-8]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T019-29304-00006, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7][IC 13-17-12]

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

B.5 Severability [326 IAC 2-7-5(5)]

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 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), 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) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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 April 15 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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (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 2-7-5(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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.11 Emergency Provisions [326 IAC 2-7-16]

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

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

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

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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 2-7-4(c)(8) 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 2-7 and any other applicable rules.
- (g) 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.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T019-29304-00006 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (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 2-7-4. 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 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 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (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 preconstruction approval required by 326 IAC 2-7-10.5 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 2-7-20(b)(1) and (c)(1). 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 2-7-20(b)(1) and (c)(1).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) Emission Trades [326 IAC 2-7-20(c)]
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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
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 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (e) 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.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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 Part 70 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 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 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 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.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within 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) Except as provided in 326 IAC 2-7-19(e), 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.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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 2-7-5(1)]

C.1 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 thirty percent (30%) 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.2 Open Burning [326 IAC 4-1][IC 13-17-9]

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

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A. The provisions of 326 IAC 6-5 are not federally enforceable.

C.6 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]

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

- (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (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.8 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64][326 IAC 3-8]

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as

applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.10 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

C.11 Emergency Reduction Plans [326 IAC 1-5-2][326 IAC 1-5-3]

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (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.12 Risk Management Plan [326 IAC 2-7-5(12)][40 CFR 68]

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

C.13 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5][326 IAC 2-7-6]

- (I) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, 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.
- (II)
 - (a) *CAM Response to excursions or exceedances.*
 - (1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the 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 emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
 - (2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
 - (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

- (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
- (d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8(b)(2).
- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(c) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
 - (1) Failed to address the cause of the control device performance problems;
or
 - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) *CAM recordkeeping requirements.*
 - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(c) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.
 - (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(b)(3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (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 Part 70 permit.

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

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

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

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of

permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)][326 IAC 2-1.1-11] [40 CFR 64][326 IAC 3-8]

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

- (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

- (b) The address for report submittal is:

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

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

- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

- (a) Indoor shot blasting operations, identified as EU-01, with a maximum capacity of 600 marine vessels per year, consisting of:
- (1) One (1) shot blast unit, known as Pangborn (No. 1), constructed in 1980, with a maximum airflow of 13,000 acfm, using steel shot, and exhausting to a baghouse dust collector identified as BH1.
 - (2) One (1) shot blast unit, known as Wheelabrator (No. 2), constructed in 1970, with a maximum airflow of 12,000 acfm, using steel shot, and exhausting to a baghouse dust collector identified as BH2.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the Pangborn (No. 1) and Wheelabrator (No. 2) shot blast units (EU-01) shall be limited to 0.03 grain per dry standard cubic foot of exhaust air each.

D.1.2 PSD and Nonattainment NSR Minor Limits [326 IAC 2-2][326 IAC 2-1.1-5]

In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the Permittee shall comply with the following emission limitations:

PM, PM₁₀, and PM_{2.5} emissions from the indoor blasting operations (EU-01) shall be less than the values in the following table:

Emission Unit	PM Limit (lb/hr)	PM ₁₀ Limit (lb/hr)	PM _{2.5} Limit (lb/hr)
EU-01: Pangborn (No. 1)	9.06	9.06	9.06
EU-01: Wheelabrator (No. 2)	9.06	9.06	9.06

Compliance with the above limits, combined with the limits in Conditions D.2.2, D.3.4 and D.3.5 and the potential to emit PM, PM₁₀, and PM_{2.5} from other units at this source, shall limit the potential to emit of PM and PM₁₀ from the entire source to less than two hundred and fifty (250) tons per twelve (12) consecutive month period each and shall limit the potential to emit PM_{2.5} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period and render the requirements of PSD (326 IAC 2-2) and Nonattainment NSR (326 IAC 2-1.1-5) not applicable to the source.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these units 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 2-7-5(1)]

D.1.4 Particulate Control

- (a) In order to ensure compliance with Conditions D.1.1 and D.1.2, the baghouse dust collectors identified as BH1 and BH2 shall be in operation and control emissions from the Pangborn (No. 1) and Wheelabrator (No. 2) shot blast units at all times the shot blast units are in operation.
- (b) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (c) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.1.5 Visible Emissions Notations [40 CFR 64]

- (a) Daily visible emission notations of the exhaust from baghouses BH1 and BH2, controlling emissions from the Pangborn (No. 1) and Wheelabrator (No. 2) shot blast units shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response step(s). Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response step(s) required by this condition. Failure to take a response step(s) shall be considered a deviation from this permit.

D.1.6 Parametric Monitoring [40 CFR 64]

The Permittee shall record the pressure drop across the baghouse BH1 used in conjunction with the Pangborn (No. 1) shot blast unit at least once per day when the Pangborn (No. 1) shot blast unit is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 1.0 and 7.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response step(s) required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take a response step(s) shall be considered a deviation from this permit.

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

D.1.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the Wheelabrator (No. 2) shot blast unit. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection - Multi-Compartment Baghouse [40 CFR 64]

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.5, the Permittee shall maintain daily records of the visible emission notations of the exhaust from baghouses BH1 and BH2. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (e.g. the process did not operate that day).
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain daily records of the pressure drop across the baghouse, BH1, controlling emissions from the Pangborn (No. 1) shot blast unit. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).
- (c) To document the compliance status with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

- (b) Surface coating operations consisting of the following:
- (1) Two (2) spray booths, identified as EU-02, for the application of weld-through (shop) primer when performing shipbuilding, with a maximum capacity of 600 marine vessels per year, with emissions controlled by paint arrestor pads, identified as PA1 and PA2. Unit No. 1 was constructed in 1980. Unit No. 2 was constructed in 1970. Under 40 CFR 63, Subpart II, this is considered shipbuilding and repair.
 - (2) Outdoor spray operations, identified as EU-03, constructed in 1939, consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications, with a maximum capacity of 600 marine vessels per year. A portion of the outdoor spray operations are conducted under cover that was installed in 2006. Under 40 CFR 63, Subpart II, this is considered shipbuilding and repair.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter (PM) emissions from the spray booths (EU-02) shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

D.2.2 PSD and Nonattainment NSR Minor Limits [326 IAC 2-2][326 IAC 2-1.1-5]

In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) not applicable, the Permittee shall comply with the following emission limitations:

Emission Unit	PM Limit (lb/hr)	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
EU-02: Spray Booth No. 1	2.28	2.28	2.28
EU-02: Spray Booth No. 2	2.28	2.28	2.28

Compliance with the above limits, combined with the limits in Conditions D.1.2, D.3.4 and D.3.5, and the potential to emit from other units at this source, shall limit the potential to emit of PM and PM10 from the entire source to less than two hundred fifty (250) tons per twelve (12) consecutive month period each and the potential to emit of PM 2.5 from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period and render the requirements of PSD (326 IAC 2-2) and Nonattainment NSR (326 IAC 2-1.1-5) not applicable to the source.

D.2.3 Particulate [326 IAC 6-3][326 IAC 6-5]

Pursuant to 326 IAC 6-3-2(d) (Particulate Matter Emission Limitations for Manufacturing Processes), particulate from the outside spray operations (EU-03) shall be controlled by the following work practice standards:

- (a) Surface coating operations shall be conducted in such a manner that all particulate matter (drift or over spray) remains on the source's property.
- (b) Surface coating with spray application shall be limited to times when the wind velocity and direction does not cause overspray to cross the property line.
- (c) Surface coating with spray application shall be conducted with the use of containment

methods such as curtains or shrouds where practical and possible.

- (d) Surface coating of flat horizontal surfaces of vessels shall be accomplished by rolling or brushing when practical.

Compliance with the above work practice standards shall also satisfy compliance with 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations).

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-12-4]

Pursuant to 326 IAC 8-12-4(a) (Shipbuilding or ship repair operations in Clark, Floyd, Lake, or Porter counties), VOC emissions from the No. 1 and No. 2 spray booths (EU-02) and the outdoor surface coating operations (EU-03) shall be limited as follows:

- (a) During application of specialty coatings, VOC emissions shall be limited throughout the year as follows:

- (1) Special marking coatings shall not exceed a VOC content of four and eight-hundredths (4.08) pounds per gallon.
- (2) Heat resistant and high-gloss coatings shall not exceed a VOC content of three and fifty-hundredths (3.50) pounds per gallon.
- (3) High-temperature coatings shall not exceed a VOC content of four and seventeen-hundredths (4.17) pounds per gallon.
- (4) Any other specialty coating shall not exceed a VOC content of two and eighty-three hundredths (2.83) pounds per gallon.

Pursuant to 326 IAC 8-1-5 (Site-specific RACT plan) and Commissioner's Order and Variance No. 2014-01 issued on August 27, 2014 under IC 13-4-1-9, IC 13-14-21, and IC 13-14-8-8, this does not include antifoulant specialty coatings used in the outdoor surface coating operations (EU-03).

- (b) During application of any general use coating, VOC emissions shall be limited as follows:

- (1) The VOC content of any general use coating shall not exceed two and eighty-three hundredths (2.83) pounds per gallon, as applied.
- (2) From May 1 through September 30, no thinner shall be added to any general use coating.

- (c) During application of any weld-through (shop) preconstruction primer, VOC emissions shall be limited throughout the year as follows:

- (1) Waterbased weld-through (shop) preconstruction primer shall be used.
- (2) The VOC content of weld-through (shop) preconstruction primer, as applied, shall not exceed zero (0).
- (3) No VOC containing cleaning material shall be used in the primer application facility.
- (4) No VOC containing thinner shall be added to the weld-through (shop) preconstruction primer.

- (d) If the Permittee determines that a waterbased weld-through (shop) preconstruction primer can no longer be used due to an operational, performance, or availability constraint associated with the waterbased weld-through (shop) preconstruction primer, the Permittee shall do the following:
- (1) Notify the department within seven (7) days of discontinuing use of the waterbased weld-through (shop) preconstruction primer.
 - (2) Submit to the department for approval a plan for an alternative control within sixty (60) days of discontinuance. The alternative control shall consist of one (1) of the following:
 - (A) A waterbased weld-through (shop) preconstruction primer.
 - (B) A control system with a minimum overall VOC emissions reduction efficiency of ninety-five percent (95%) that is subject to each of the following requirements:
 - (i) The operation, maintenance, and testing requirements of 326 IAC 8-7-9.
 - (ii) The monitoring, record keeping, and reporting requirements of 326 IAC 8-7-10.
 - (3) Install the alternative control within nine (9) months of approval by the department of the plan required in D.2.5(d)(2).
- (e) During the time between the date when the Permittee discontinues the use of the waterbased preconstruction primer and the date when the alternative control is installed, the weld-through (shop) preconstruction primer used by the Permittee shall not exceed a VOC content of five and sixty-five hundredths (5.65) pounds per gallon or the VOC content for weld-through (shop) preconstruction primer prescribed by the U.S. EPA in 40 CFR 63, Subpart II, National Emission Standard for Shipbuilding and Ship Repair (surface coating), whichever is lower.

D.2.5 Site-Specific RACT Plan and Commissioner's Order and Variance [326 IAC 8-1-5][IC 13-14-1-9][IC 13-14-2-1][IC 13-4-8-8]

Pursuant to 326 IAC 8-1-5 (Site-specific RACT plan) and Commissioner's Order and Variance No. 2014-01 issued on August 27, 2014 under IC 13-14-1-9, IC 13-14-2-1, and IC 13-14-8-8, the VOC content of antifoulant specialty coatings used in the outdoor surface coating operations (EU-03) shall not exceed 3.33 pounds per gallon or less, in lieu of the specialty coatings limit in 326 IAC 8-12-4 (Condition D.2.4(a)(4)).

D.2.6 Work Practice Standards [326 IAC 8-12-4]

Pursuant to 326 IAC 8-12-4(b), the Permittee shall comply with the following work practice standards:

- (a) Cleaning accessories, such as, but not limited to, paper, cloth, and rags that have been used for cleaning surfaces and equipment and that contain cleaning materials shall be stored in normally closed gasket sealed containers.
- (b) VOC-containing solvents and coatings shall be stored in normally closed sealed containers prior to use. Spent VOC-containing solvents and coatings shall be stored in normally closed gasket sealed containers.
- (c) Cleaning materials for cleaning spray equipment, including paint lines, shall not be used unless the equipment for collecting the cleaning materials and minimizing its evaporation

to the atmosphere is used.

- (d) All handling and transfer of VOC-containing materials to and from containers, tanks, vats, drums, and piping systems shall be conducted in a manner that minimizes drips and spills, and any drips and spills shall be cleaned up promptly.
- (e) All containers, tanks, vats, drums, and piping systems shall be free of cracks, holes and other defects and must be closed unless materials are being added to or removed from them.

D.2.7 Training Requirements [326 IAC 8-12-4]

Pursuant to 326 IAC 8-12-4(c), the Permittee shall comply with the following training requirements:

- (a) The training program may include training provided by the manufacturer or supplier of coatings, cleaning materials, or the application equipment thereof, and shall include written procedures, hands-on demonstration, as appropriate, and certification by the trainer of the trainee's ability to perform the task, on the following activities:
 - (1) Identification of appropriate coatings or cleaning materials.
 - (2) Preparation of coatings or cleaning materials according to coating or cleaning material manufacturer, distributor, or owner or operator's recommendations.
 - (3) Application of coatings or cleaning materials, or organic solvents using techniques that minimize their usage.
 - (4) Procedures to clean spray guns to minimize evaporation of organic solvents to the atmosphere.
 - (5) Work practice standards established in 326 IAC 8-12-4(b).
 - (6) Procedures to gather, record, monitor, and report data in accordance with 40 CFR 63.787 and 40 CFR 63.788.
- (b) The Permittee shall provide annual refresher training prior to May 1 to any worker performing one (1) or more of the activities listed in 326 IAC 8-12-4(c)(3). Such training shall be appropriate to the job responsibilities of the worker.
- (c) Any worker may perform one (1) or more activities listed in 326 IAC 8-12-4(c)(3), for not more than one hundred eighty (180) days, notwithstanding the requirement of 326 IAC 8-12-4(c)(2), provided:
 - (1) such untrained worker works under the supervision of a worker who meets the training requirements of 326 IAC 8-12-4(c)(2); and
 - (2) the Permittee keeps records of:
 - (A) The date the worker was assigned to the activity;
 - (B) The date training was completed; and
 - (C) The name of the worker providing the supervision.

D.2.8 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements [326 IAC 2-7-5(1)]

D.2.9 Volatile Organic Compounds (VOC) [326 IAC 8-12-5][326 IAC 8-1-5][326 IAC 8-1-5][IC 13-14-1-9][IC 13-14-2-1][IC 13-4-8-8]

- (a) Pursuant to 326 IAC 8-12-5, the paint booths (EU-02) and the outdoor spray operation (EU-03) shall determine compliance using the methods in 40 CFR 63.784 and 40 CFR 63.785, as incorporated by reference in 326 IAC 20-26, in lieu of 326 IAC 8-12-5.
- (b) In order to comply with Condition D.2.5, the outdoor spray operation (EU-03) shall determine compliance using the methods in 40 CFR 63.784 and 40 CFR 63.785, as incorporated by reference in 326 IAC 20-26.

D.2.10 Particulate Control

In order to ensure compliance with Conditions D.2.1 and D.2.2, the paint arrestor pads for particulate control, identified as PA1 and PA2, shall be in operation and control emissions from the two (2) paint booths (EU-02) at all times that the paint booths are in operation.

D.2.11 Wind Velocity

In order to comply with Condition D.2.3(b), the Permittee shall determine the wind velocity and direction before the start of outdoor surface coating operations using spray application (EU-03).

- (a) If the Permittee determines that the wind velocity and/or direction could lead to overspray emissions that cross property boundaries, outdoor surface coating operations using spray application shall not commence until such time that favorable wind conditions prevail.
- (b) If, after commencing outdoor surface coating operations using spray application, changes in the wind velocity and/or direction occurs and will cause overspray to cross the property boundaries, all outdoor surface coating using spray application shall cease operation until such time that favorable wind conditions prevail.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)][40 CFR Part 64]

D.2.12 Monitoring [40 CFR 64]

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the paint arrestor pads for the paint booths (EU-02). To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stack(s) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take a reasonable response step(s). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response step(s) required by this condition. Failure to take a response step(s) 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 nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response step(s). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the response step(s) required by this condition. Failure to take a response step(s) shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.2.13 Record Keeping Requirements

- (a) Pursuant to 326 IAC 8-12-7, sources subject to 326 IAC 8-12 and 326 IAC 20-26 shall comply with the record keeping, notification, and reporting requirements of 40 CFR 63.787 and 40 CFR 63.788, as incorporated by reference in 326 IAC 20-26, in lieu of 326 IAC 8-12-7.
- (b) To document the compliance status with Condition D.2.5, the Permittee shall comply with the record keeping, notification, and reporting requirements of 40 CFR 63.787 and 40 CFR 63.788, as incorporated by reference in 326 IAC 20-26.
- (c) To document the compliance status with Conditions D.2.3(b) and D.2.11, the Permittee shall maintain a log of wind velocity and wind direction readings.
- (d) To document the compliance status with Condition D.2.12, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections. The Permittee shall include in its daily record when an observation is not taken and the reason for the lack of observation, (e.g. the process did not operate that day).
- (e) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.2.14 Record Keeping Requirements - Fugitive Control Measures [326 IAC 6-5]

Pursuant to 326 IAC 6-5-5(b), records shall be kept and maintained which document all control measures and activities to be implemented in accordance with Condition D.2.3. Said records shall be available upon the request of the commissioner, and shall be retained for three (3) years.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

- (c) Welding operations, identified as EU-04, occurring outside and under a structure, for the construction of marine vessels from sheet steel, constructed in 1939, with a maximum capacity of 600 marine vessels per year, and with emissions uncontrolled and exhausted to the atmosphere.
- (d) Flame and plasma cutting operations, identified as EU-05, occurring outside and under a structure, for the construction of marine vessels from sheet steel, with flame cutting operations installed in 1939 and plasma cutting operations installed in 1990, with a maximum capacity of 600 marine vessels per year and, with emissions uncontrolled and exhausted to the atmosphere.
- (e) Four (4) abrasive outdoor blasting units for the outdoor maintenance and construction of marine vessels, collectively identified as EU-06, constructed in 2002, and approved for modification in 2016 to operate one blasting unit inside the blast building, with a maximum capacity of 4,000 pounds (2.0 tons) of grit or sand per hour, with emissions controlled by dust suppressant and exhausted to the atmosphere.

Any one of these four (4) blasting units is approved in 2016 to operate inside the blast building for maintenance and construction of marine vessels, with a maximum capacity of 1,000 pounds (0.5 tons) of grit or sand per hour, with its own cartridge-type dust collector and exhausting to a single stack to the atmosphere. While operating inside the blast building, this unit will be identified as EU-06a.

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emissions for Manufacturing Processes), the allowable particulate emission rate from the welding operations (EU-04), the flame and plasma cutting operations (EU-05), and the outdoor abrasive blasting units (EU-06) shall each not exceed 32.78 pounds per hour when operating at a maximum process weight rate of 22.26 tons per hour.

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

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

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

Where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.3.2 Fugitive Particulate Matter [326 IAC 6-5]

Pursuant to 326 IAC 6-5, the Permittee shall employ the following measures to control fugitive particulate matter emissions from the welding operations (EU-04), the flame and plasma cutting operations (EU-05), and the outdoor abrasive blasting operations (EU-06):

- (a) Welding Operations (EU-04):
 - (1) Welding operations shall be conducted in such a manner that all particulate matter remains on the source's property.

- (2) Welding operations shall be conducted with the use of containment methods such as curtains or shrouds where practical and possible.
 - (3) The surfaces to be welded shall be kept clean of oils and grease.
 - (4) Welding shall be conducted using the lowest recommended current and voltage that will provide quality welds.
 - (5) Cleanup from welding operations shall be performed through wet cleaning methods or vacuums equipped with appropriate filters.
 - (6) Welders shall be trained on operating techniques and procedures to reduce welding fumes and fugitive emissions.
- (b) Flame and Plasma Cutting Operations (EU-05):
- (1) Cutting operations shall be conducted in such a manner that all particulate matter remains on the source's property.
 - (2) Cutting operations shall be conducted with the use of containment methods such as curtains or shrouds where practical and possible.
 - (3) The surfaces to be cut shall be kept clean of oils and grease.
 - (4) Cutting shall be conducted using lower recommended cutting speeds to minimize emissions.
 - (5) Cleanup from cutting operations shall be performed through wet cleaning methods or vacuums equipped with appropriate filters.
 - (6) Cutting operators shall be trained on operating techniques and procedures to reduce fugitive emissions from cutting operations.
- (c) Outdoor Abrasive Blasting Operations (EU-06):
- (1) Outdoor abrasive blasting operations shall be conducted in such a manner that all particulate matter remains on the source's property.
 - (2) Outdoor abrasive blasting operations shall be conducted with the use of containment methods such as curtains or shrouds where practical and possible.
 - (3) The use of a dust suppressant additive or water injection shall be employed whenever the outdoor abrasive blasting units are in operation.
 - (4) Blast media shall be stored in a manner to prevent it from escaping into the atmosphere via wind erosion.
 - (5) Cleanup from outdoor abrasive blasting operations shall be performed through wet cleaning methods or vacuums equipped with appropriate filters.
 - (6) Outdoor abrasive blasting operators shall be trained on operating techniques and procedures to reduce fugitive emissions from outdoor abrasive blasting operations.

D.3.3 Particulate Matter Limitations Except Lake County [326 IAC 6.5]

Pursuant to 326 IAC 6.5-1-2(a), when operating inside the abrasive blast building, the particulate emissions from the abrasive blast unit, identified as EU-06a, shall not exceed 0.03 grain per dry standard cubic foot (dscf).

D.3.4 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following after control emission limitations:

Emission Unit	PM Limit (lb/hr)	PM ₁₀ Limit (lb/hr)
EU-06a	4.47	4.47

Compliance with the above limits, combined with the limits in Conditions D.1.2 and D.2.2 and the potential to emit from other units at this source, shall limit the potential to emit of PM and PM₁₀ from the entire source to less than two hundred fifty (250) tons per twelve (12) consecutive month period each and render the requirements of PSD (326 IAC 2-2) not applicable to the source.

D.3.5 Emission Offset Minor Limits [326 IAC 2-3]

In order to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable, the Permittee shall comply with the following after control emissions limitations:

Emission Unit	PM _{2.5} Limit (lb/hr)
EU-06a	0.02

Compliance with the above limit, combined with the limits in Conditions D.1.2 and D.2.2, and the potential to emit from other units at this source, shall limit potential to emit of PM_{2.5} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period and render the requirements of Emission Offset (326 IAC 2-3) not applicable to the source.

D.3.6 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for the indoor blast unit, identified as EU-06a, and its control device. 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 2-7-5(1)]

D.3.7 Particulate Control

- (a) In order to ensure compliance with Conditions D.3.3, D.3.4 and D.3.5, the dust collector associated with the blasting unit (EU06a) shall be in operation at all times when blasting is being done inside the building.
- (b) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (c) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.3.8 Testing Requirements [326 IAC 2-7-6(1), (6)][326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.3.5, the Permittee shall perform after-control PM_{2.5} testing of the one (1) abrasive blasting unit, identified as EU-06a, while it is operating inside the blast building. This test shall be performed no later than one hundred eighty (180) days after initial start-up of the indoor blasting, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to performance testing required by this condition. PM_{2.5} includes filterable and condensable PM_{2.5}.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.9 Visible Emissions Notations

- (a) Daily visible emission notations of the exhaust from the dust collector controlling emissions from the abrasive blast unit, identified as EU-06a, while it is operating inside the blast building, shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response step(s). Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response step(s) required by this condition. Failure to take a response step(s) shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.3.10 Record Keeping Requirements

- (a) Pursuant to 326 IAC 6-5-5(b), records shall be kept and maintained which document all control measures and activities to be implemented in accordance with Condition D.3.2. Said records shall be available upon the request of the commissioner, and shall be retained for three (3) years.
- (b) To document the compliance status with Condition D.3.9, the Permittee shall maintain daily records of the emission notations of the exhaust from the dust collector controlling the abrasive blast unit, identified as EU-06a, while it is operating inside the blast building.

The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (e.g. the process did not operate that day).
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

Insignificant Activities:

- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including the following:
 - (1) Two (2) natural gas fired water-dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
 - (2) Two (2) natural gas fired pre-dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
 - (3) Two (2) natural gas fired dry ovens, each with a maximum heat input capacity of 1.0 MMBtu/hr. [326 IAC 6.5-1]
 - (4) Two (2) natural gas fired furnaces, with a maximum heat input capacity of 3.0 MMBtu/hr. [326 IAC 6.5-1]

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the two (2) natural gas fired furnaces, the two (2) natural gas fired water-dry ovens, the two (2) natural gas fired pre-dry ovens, and the two (2) natural gas fired dry ovens shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf) of natural gas burned each.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

Insignificant Activities:

- (c) 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. [326 IAC 8-4-6]

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Gasoline Dispensing Facilities [326 IAC 8-4-6]

Pursuant to 326 IAC 8-4-6(b), the Stage I vapor recovery system requirements at the gasoline dispensing facility are as follows:

- (a) No owner or operator of a gasoline dispensing facility shall allow the transfer of gasoline between any transport and any storage tank unless the tank is equipped with the following:
- (1) A submerged fill pipe that extends to not more than:
 - (A) twelve (12) inches from the bottom of the storage tank if the fill pipe was installed on or before November 9, 2006; or
 - (B) six (6) inches from the bottom of the storage tank if the fill pipe was installed after November 9, 2006.
 - (2) Either a pressure relief valve set to release at not less than seven-tenths (0.7) pounds per square inch or an orifice of five-tenths (0.5) inch in diameter.
 - (3) A vapor balance system connected between the tank and the transport, operating according to manufacturer's specifications.
- (b) If the owner or employees of the owner of a gasoline dispensing facility are not present during loading, it shall be the responsibility of the owner or the operator of the transport to make certain the vapor balance system is:
- (1) connected between the transport and the storage tank; and
 - (2) operating according to manufacturer's specifications.

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

Insignificant Activities:

- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-8]

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

- (a) Pursuant to 326 IAC 8-3-2(a), the owner or operator of a cold cleaner degreaser shall 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) Pursuant to 326 IAC 8-3-2(b), the owner or operator of a cold cleaner degreaser shall 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.6.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaning Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent 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).

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

D.6.3 Record Keeping Requirements

- (a) To document the compliance status with Condition D.6.2, the Permittee shall maintain the following records for each purchase of solvent. These records shall be retained on-site 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.
 - (3) The type of solvent.
 - (4) The volume of each unit of solvent.
 - (5) The total volume of the solvent.
 - (6) 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 - Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

SECTION E.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

- (b) Surface coating operations consisting of the following:
- (1) Two (2) spray booths, identified as EU-02, for the application of weld-through (shop) primer when performing shipbuilding, with a maximum capacity of 600 marine vessels per year with emissions controlled by paint arrestor pads, identified as PA1 and PA2. Unit No. 1 was constructed in 1980. Unit No. 2 was constructed in 1970. Under 40 CFR 63, Subpart II, this is considered shipbuilding and repair.
 - (2) Outdoor spray operations, identified as EU-03, constructed in 1939, consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications, with a maximum capacity of 600 marine vessels per year. A portion of the outdoor spray operations are conducted under cover that was installed in 2006. Under 40 CFR 63, Subpart II, this is considered shipbuilding and repair.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to NESHAP II [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.780, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the emissions units listed above, except as otherwise specified in Table 1 of 40 CFR 63, Subpart II and in accordance with the schedule in 40 CFR 63, Subpart II.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46201-2251

E.1.2 Shipbuilding and Ship Repair (Surface Coating) NESHAP [40 CFR 63, Subpart II][326 IAC 20-26]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart II, included as Attachment B to the operating permit and which is incorporated by reference as 326 IAC 20-26-1 for the emission units listed above:

- (1) 40 CFR 63.780;
- (2) 40 CFR 63.781(a)-(c);
- (3) 40 CFR 63.782;
- (4) 40 CFR 63.783;
- (5) 40 CFR 63.784(a);
- (6) 40 CFR 63.785;
- (7) 40 CFR 63.786(a)-(d);
- (8) 40 CFR 63.787;
- (9) 40 CFR 63.788(a), (b)(1)-(b)(4), (c);
- (10) 40 CFR 63.789;
- (11) Table 1 to Subpart II of 40 CFR 63;
- (12) Table 2 to Subpart II of 40 CFR 63;
- (13) Table 3 to Subpart II of 40 CFR 63.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Jeffboat, LLC
Source Address: 1030 East Market Street, Jeffersonville, Indiana 47130
Part 70 Permit No.: T019-29304-00006

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Jeffboat, LLC
Source Address: 1030 East Market Street, Jeffersonville, Indiana 47130
Part 70 Permit No.: T019-29304-00006

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Jeffboat, LLC
Source Address: 1030 East Market Street, Jeffersonville, Indiana 47130
Part 70 Permit No.: T019-29304-00006

Months: _____ to _____ Year: _____

Page 1 of 2

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".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

**Technical Support Document (TSD) for a Part 70 Significant Permit
Modification**

Source Description and Location

Source Name:	Jeffboat, LLC
Source Location:	1030 East Market Street, Jeffersonville, IN 47130
County:	Clark County
SIC Code:	3731 (Ship Building and Repairing)
Operation Permit No.:	T 019-29304-00006
Operation Permit Issuance Date:	December 5, 2011
Significant Permit Modification No.:	019-36951-00006
Permit Reviewer:	Deborah Cole

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 019-29304-00006 on December 5, 2011. The source has since received the following approval:

- (a) Significant Permit Modification No. 019-34921-00006, issued on December 8, 2014.

County Attainment Status

The source is located in Clark County.

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

¹Attainment effective October 23, 2001, for the 1-hour ozone standard for the Louisville area, including Clark County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standard (NAAQS) for purposes of 40 CFR Part 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Clark County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Clark County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.

- (c) Other Criteria Pollutants
 Clark 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.

See TSD to Part 70 Operating Permit Renewal No. 019-29304-00006, issued on December 5, 2011 for a more detailed discussion about fugitive emissions at Jeffboat, LLC.

Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Issuance of Modification (tons/year)									
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP	GHGs
EU-01: Pangborn Shot Blast Unit	39.7	39.7	39.7	--	--	--	--	23.79	23.79 (Mn)	--
EU-01: Wheelabrator Shot Blast Unit	39.7	39.7	39.7	--	--	--	--	21.96	21.96 (Mn)	--
EU-02: Spray Booth No. 1 for Weld-Through Primer	10	10	10	--	--	--	--	--	--	--
EU-02: Spray Booth No. 2 for Weld-Through Primer	10	10	10	--	--	--	--	--	--	--
Insignificant Activities										
Natural Gas Combustion Units (ovens and furnaces)	0.10	0.39	0.39	0.03	5.15	0.28	4.33	0.10	0.093 (hexane)	1246.01
Gasoline Dispensing Operation	--	--	--	--	--	*	--	*	*	--
Degreasing Operation	--	--	--	--	--	*	--	*	*	--
Fugitive Emissions ¹										
EU-03: Outdoor Spray Operations (fugitive)	432.2	432.2	432.2	--	--	391.7	--	120.9	99.1 (xylene)	--
EU-04: Welding Operations (fugitive)	40.2	40.2	40.2	--	--	--	--	34.5	21.22 (Mn cmpds)	6196.24
EU-05: Flame and Plasma Cutting (fugitive) ²	93.8	93.8	93.8	--	--	--	--	0.35	0.28 (Mn cmpds)	*
EU-06: Four Abrasive Outdoor Blasting Units (fugitive)	1594.3	227.8	22.8	--	--	--	--	*	*	--

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Issuance of Modification (tons/year)									
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP	GHGs
Paved and Unpaved Roads (fugitive)	*	*	*	--	--	--	--	--	--	--
Total PTE of Entire Source**	99.5	99.8	99.8	0.03	5.15	>0.28³	4.33	>25	>10	>7442.3³
PSD Major Source Thresholds	250	250	N/A	250	250	250	250	N/A	N/A	100,000 CO ₂ e
Emission Offset/ Nonattainment NSR Major Source Thresholds	N/A	N/A	100	100	N/A	N/A	N/A	N/A	N/A	N/A
*Not estimated ¹ Fugitive emissions are not counted toward the determination of PSD, Emission Offset, or Nonattainment NSR applicability and have not been included in the Total PTE of Entire Source calculation. ² Emissions taken from Part 70 Operating Permit Renewal No. T019-18066-00006 ³ Some of the emissions are not calculated; however, it is not expected that the total emissions will exceed 250 tons per year of VOC or 100,000 tons per year of CO ₂ e.										

This emission table was constructed from the Emission Summary in Appendix A of Significant Permit Modification No.: 019-34921-00006, issued on December 8, 2014.

- (a) On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

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

- (b) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, 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).
- (c) This existing source is not a major stationary source, under nonattainment new source review rules (326 IAC 2-1.1-5) because direct PM_{2.5} and/or SO₂ is not emitted at a rate of 100 tons per year or more.
- (d) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application submitted by Jeffboat, LLC on September 11, 2015, requesting to create an alternative operating scenario which will allow Jeffboat to operate one (1) of the existing four outdoor blasting units, inside a building, using a cartridge-type dust collector as control and exhausting through a stack. There are no new blasting units being proposed in this modification.

Based on the information provided in the application, IDEM initially determined that the proposed modification to allow one (1) outdoor abrasive blasting unit to operate inside a blast building would require a Significant Source Modification (approval to construct due to the increase of the capacity of the blasting unit which causes the difference in potential to emit $PM_{2.5}$ of the modification greater than twenty-five (25) tons per year). A draft permit was provided to Jeffboat on March 18, 2016. Telephone conferences were held on April 26 and May 2, 2016. Based on the additional information, which was different from the information contained in the original application submitted on September 11, 2015, and a determination of the exact type of blast material (sand or grit) to be used when operating indoors indicated that there is no change in the potential to emit as a result of the periodic change in location of one (1) blaster and no increase in maximum capacity of the blasting unit. Based on the additional information provided, IDEM determined that a Significant Source Modification was not needed. The change in location will be permitted under a Significant Permit Modification because significant applicable requirements will be added to the permit when the blasting unit is operating inside a building.

IDEM determined that the outdoor operations, including the outdoor abrasive blasting operation (EU-06), should be treated as fugitive emissions. (See TSD for TV Renewal No.: 019-29304-00006, issued on December 5, 2011, for discussion of fugitive emissions.) As such, they are not counted toward the overall potential to emit of the source. However, the blast emissions inside the building which will result from this proposed modification are not fugitive and will be counted toward the overall potential to emit and are subject to 326 IAC 6.5-1-2(a)(Particulate Matter Limitations Except Lake County). These emissions have been included in Appendix A and counted toward overall potential to emit.

The following is the proposed emission unit and pollution control device:

Four (4) abrasive outdoor blasting units for the outdoor maintenance and construction of marine vessels, collectively identified as EU-06, constructed in 2002, approved for modification in 2016 to operate one blasting unit inside the blast building, with a maximum capacity of 2.0 tons of grit or sand per hour, and with emissions controlled by dust suppressant and exhausted to the atmosphere.

Any one of these four (4) blasting units is approved in 2016 to operate inside the blast building for maintenance and construction of marine vessels, with a maximum capacity of 1,000 pounds (0.5 tons) of grit or sand per hour, using its own cartridge-type dust collector for control and exhausting to a single stack to the atmosphere. While operating inside the blast building, it will be identified as EU-06a.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

Process/ Emission Unit	Uncontrolled PTE of Proposed Modification (tons/year)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NOx	VOC	CO	Total HAPs	Worst Single HAP
PTE of the Existing Configuration: 4 blasting units operating outdoor (grit and sand)	1594.32	227.76	22.78	0.00	0.00	0.00	0.00	0.00	0.00
Proposed configuration: 3 blasting units operating outdoors and 1 unit operating indoors (grit and sand)	1594.32	227.76	22.78	0.00	0.00	0.00	0.00	0.00	0.00
PTE Proposed Modification	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

PTE of the Modification = Total PTE of the Proposed Configuration – PTE of the Existing Configuration

The PTE did not change due to the change in location because the maximum capacity of the blasting units did not change.

Significant Permit Modification

- (a) This permit modification is considered a significant permit modification, pursuant to 326 IAC 2-7-12(d)(1) because this modification does not qualify as a minor permit modification or administrative amendment.
- (b) Additionally, pursuant to 326 IAC 2-7-12(d)(1), every significant change in existing monitoring Part 70 permit terms or conditions shall be considered significant.

Permit Level Determination - PSD and Nonattainment NSR

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 source modification, 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 the Modification (tons/year)									
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP	GHGs
EU-01: Pangborn Shot Blast Unit	39.7	39.7	39.7	--	--	--	--	23.79	23.79 (Mn)	--
EU-01: Wheelabrator Shot Blast Unit	39.7	39.7	39.7	--	--	--	--	21.96	21.96 (Mn)	--
EU-02: Spray Booth No. 1 for Weld-Through Primer	10	10	10	--	--	--	--	--	--	--
EU-02: Spray Booth No. 2 for Weld-Through Primer	10	10	10	--	--	--	--	--	--	--
EU-06a - Blasting Emissions for Inside Blast Building⁽⁴⁾	19.60	19.60	0.09	--	--	--	--	--	--	--
Insignificant Activities										
Natural Gas Combustion Units (ovens and furnaces)	0.10	0.39	0.39	0.03	5.15	0.28	4.33	0.10	0.093 (hexane)	1246.04
Gasoline Dispensing Operation	--	--	--	--	--	*	--	*	*	--
Degreasing Operation	--	--	--	--	--	*	--	*	*	--
Fugitive Emissions ¹										
EU-03: Outdoor Spray Operations (fugitive)	432.2	432.2	432.2	--	--	391.7	--	120.9	99.1 (xylene)	--
EU-04: Welding Operations (fugitive)	40.2	40.2	40.2	--	--	--	--	34.5	21.22 (Mn cmpds)	6196.24
EU-05: Flame and Plasma Cutting (fugitive) ²	93.8	93.8	93.8	--	--	--	--	0.35	0.28 (Mn cmpds)	*
EU-06: Four Abrasive Outdoor Blasting Units (fugitive)	1594.3	227.8	22.8	--	--	--	--	*	*	--
Paved and Unpaved Roads (fugitive)	*	*	*	--	--	--	--	--	--	--
Total PTE of Entire Source**	99.5 119.10	99.8 119.39	99.8 99.88	0.03	5.15	>0.28³	4.33	>25	>10	>7442.3³
PSD Major Source Thresholds	250	250	N/A	250	250	250	250	N/A	N/A	100,000 CO ₂ e
Emission Offset/ Nonattainment NSR Major Source Thresholds	N/A	N/A	100	100	N/A	N/A	N/A	N/A	N/A	N/A

*Not estimated

** See Appendix A for complete calculations.

¹Fugitive emissions are not counted toward the determination of PSD, Emission Offset, or Nonattainment NSR applicability and have not been included in the Total PTE of Entire Source calculation.

²Emissions taken from Part 70 Operating Permit Renewal No. T019-18066-00006

³Some of the emissions are not calculated; however, it is not expected that the total emissions will exceed 250 tons per year of VOC.

⁴Limits to render 326 IAC 2-2 and 2-3 not applicable.

The following table is used to determine the appropriate permit level under 326 IAC 2-7. This table reflects the PTE after permit issuance and has the **bold** and ~~strikeout~~ removed.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of the Modification (tons/year)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
EU-01: Pangborn Shot Blast Unit	39.7	39.7	39.70	--	--	--	--	23.79	23.79 (Mn)
EU-01: Wheelabrator Shot Blast Unit	39.7	39.7	39.70	--	--	--	--	21.96	21.96 (Mn)
EU-02: Spray Booth No. 1 for Weld-Through Primer	10	10	10	--	--	--	--	--	--
EU-02: Spray Booth No. 2 for Weld-Through Primer	10	10	10	--	--	--	--	--	--
EU-06a - Blasting Emissions for Inside Blast Building ⁽⁴⁾	19.60	19.60	0.09	--	--	--	--	--	--
Insignificant Activities									
Natural Gas Combustion Units (ovens and furnaces)	0.10	0.39	0.39	0.03	5.15	0.28	4.33	0.10	0.093 (hexane)
Gasoline Dispensing Operation	--	--	--	--	--	*	--	*	*
Degreasing Operation	--	--	--	--	--	*	--	*	*
Fugitive Emissions ¹									
EU-03: Outdoor Spray Operations (fugitive)	432.2	432.2	432.2	--	--	391.7	--	120.9	99.1 (xylene)
EU-04: Welding Operations (fugitive)	40.2	40.2	40.2	--	--	--	--	34.5	21.22 (Mn cmpds)
EU-05: Flame and Plasma Cutting (fugitive) ²	93.8	93.8	93.8	--	--	--	--	0.35	0.28 (Mn cmpds)
EU-06: Four Abrasive Outdoor Blasting Units (fugitive)	1594.3	227.8	22.8	--	--	--	--	*	*
Paved and Unpaved Roads (fugitive)	*	*	*	--	--	--	--	--	--
Total PTE of Entire Source**	119.10	119.39	99.88	0.03	5.15	>0.28³	4.33	>25	>10
PSD Major Source Thresholds	250	250	N/A	250	250	250	250	N/A	N/A
Emission Offset/ Nonattainment NSR Major Source Thresholds	N/A	N/A	100	100	N/A	N/A	N/A	N/A	N/A
<p>*Not estimated ** See Appendix A for complete calculations. ¹Fugitive emissions are not counted toward the determination of PSD, Emission Offset, or Nonattainment NSR applicability and have not been included in the Total PTE of Entire Source calculation. ²Emissions taken from Part 70 Operating Permit Renewal No. T019-18066-00006 ³Some of the emissions are not calculated; however, it is not expected that the total emissions will exceed 250 tons per year of VOC. ⁴Limits to render 326 IAC 2-2 and 326 IAC 2-3 not applicable.</p>									

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, 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 a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability Determination

NSPS:

There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

NESHAP:

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

CAM:

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

- (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
Abrasive Blasting Unit EU-06a (PM, PM ₁₀ and PM _{2.5})	Dust Collector	Y (326 IAC 2-2, 326 IAC 2-3 and 326 IAC 6.5-1-2(a))	less than 100 (only 1 blasting unit)	less than 100	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to the abrasive blasting unit, identified as EU-06A, for PM, PM₁₀ and PM_{2.5} when operating inside the blast building.

State Rule Applicability Determination - Entire Source

Indoor Abrasive Blasting Operations (EU-06a)

326 IAC 2-2 (Prevention of Significant Deterioration)

Since the unrestricted potential to emit of non-fugitive PM and PM₁₀ exceeds two hundred-fifty (250) tons per year for the abrasive blasting unit, identified as EU-06a, when operating inside a blast building, the emissions shall be limited as follows to render 326 IAC 2-2 not applicable:

PM and PM₁₀ emissions after control from the abrasive blasting unit, identified as EU-06(a), shall be limited as follows:

Emission Unit	Control	PM Limit (lb/hr)	PM ₁₀ Limit (lb/hr)
EU-06a: Abrasive Blasting Unit	Dust collector	4.47	4.47

The dust collector associated with the blast unit shall be in operation at all times blasting is being done inside the building in order to comply with these limits.

326 IAC 2-3 Emission Offset Minor Limits

Clark County has been classified as nonattainment for PM_{2.5}.

Since the unrestricted potential to emit of non-fugitive PM_{2.5} exceeds one hundred (100) tons per year for the abrasive blasting unit, identified as EU-06a, when operating inside a blast building, the emissions shall be limited as follows to render 326 IAC 2-3 not applicable:

Emission Unit	Control	PM _{2.5} Limit (lb/hr)
EU-06a: Abrasive Blasting Unit	Dust Collector	0.02

The dust collector associated with the blast unit shall be in operation at all times blasting is being done inside the building in order to comply with this limit.

State Rule Applicability Determination - Individual Facilities

EU-06a: Abrasive Blasting Unit

326 IAC 6.5-1 (Particulate Matter Limitations Except Lake County)

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the abrasive blasting unit, identified as EU-06a, shall not exceed 0.03 grains per dry standard cubic foot.

The cartridge-type dust collector shall be in operation and control emissions from this unit at all times this unit is in operation in order to comply with the 326 IAC 6.5-1.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. 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 modification are as follows:

(a) Compliance Determination Requirements:

Emission Controls Operation

The dust collector for particulate emissions control of the abrasive blasting unit located inside a building shall be in operation and control particulate emissions at all times the unit is in operation inside the building.

(b) Compliance Monitoring Requirements:

The compliance monitoring requirements applicable to the dust collector that controls the abrasive blasting unit when operating inside the building:

Daily Visible Emissions Notations

These monitoring conditions are necessary because the dust collector for the abrasive blasting unit, identified as EU-06a, located in the blast building, must operate properly to ensure compliance with 326 IAC 6.5 Particulate Matter Limitations Except Lake County and 326 IAC 2-7 (Part 70)).

(c) The testing requirements applicable to this proposed modification are as follows:

Emission Unit	Pollutant	Timeframe for Testing	Frequency of Testing
Indoor Abrasive Blasting (EU-06a) ⁽²⁾	PM _{2.5} (After Control) ⁽¹⁾	No later than 180 days after initial operation of a blast unit inside the building	Every five years

(1) The source must perform after-control PM_{2.5} testing in order to verify that the controlled potential to emit of the indoor abrasive blasting unit (EU-06a) will meet the applicable PM_{2.5} limit that renders 326 IAC 2-3 not applicable.

(2) Even though there are PM and PM₁₀ limits after control specified in the permit to render 326 IAC 2-2 not applicable, no testing is required for these pollutants because in order to comply with the limits, the control device for EU-06a requires lower overall control efficiencies than the manufacturer's specifications (control efficiency for PM and PM₁₀ is 99.99%.)

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 019-29304-00006, issued on December 5, 2011. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

SECTION A SOURCE SUMMARY

...

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

..

- (e) Four (4) abrasive outdoor blasting units for the outdoor maintenance and construction of marine vessels, collectively identified as EU-06, constructed in 2002, **and approved for modification in 2016 to operate one blasting unit inside the blast building**, with a maximum capacity of 4,000 pounds (2.0 tons) of ~~blast media~~ **grit or sand** per hour, with emissions controlled by dust suppressant and exhausted to the atmosphere.

Any one of these four (4) blasting units is approved in 2016 to operate inside the blast building for maintenance and construction of marine vessels, with a maximum capacity of 1,000 pounds (0.5 tons) of grit or sand per hour, using its own cartridge-type dust collector for control and exhausting to a single stack to the atmosphere. While operating inside the blast building, this unit will be identified as EU-06a.

...

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

- (c) Welding operations, identified as EU-04, occurring outside and under a structure, for the construction of marine vessels from sheet steel, constructed in 1939, with a maximum capacity of 600 marine vessels per year, and with emissions uncontrolled and exhausted to the atmosphere.
- (d) Flame and plasma cutting operations, identified as EU-05, occurring outside and under a structure, for the construction of marine vessels from sheet steel, with flame cutting operations installed in 1939 and plasma cutting operations installed in 1990, with a maximum capacity of 600 marine vessels per year and, with emissions uncontrolled and exhausted to the atmosphere.
- (e) Four (4) abrasive outdoor blasting units for the outdoor maintenance and construction of marine vessels, collectively identified as EU-06, constructed in 2002, **and approved for modification in 2016 to operate one blasting unit inside the blast building**, with a maximum capacity of 4,000 pounds (2.0 tons) of ~~blast media~~ **grit or sand** per hour, with emissions controlled by dust suppressant and exhausted to the atmosphere.

Any one of these four (4) blasting units is approved in 2016 to operate inside the blast building for maintenance and construction of marine vessels, with a maximum capacity of 1,000 pounds (0.5 tons) of grit or sand per hour, using its own cartridge-type dust collector for control and exhausting to a single stack to the atmosphere. While operating inside the blast building, this unit will be identified as EU-06a.

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

...

D.3.3 Particulate Matter Limitations Except Lake County [326 IAC 6.5]

Pursuant to 326 IAC 6.5-1-2(a), when operating inside the abrasive blast building, the particulate emissions from the abrasive blasting unit, identified as EU-06a, shall not exceed 0.03 grain per dry standard cubic foot (dscf).

D.3.4 PSD Minor Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following after control emission limitations:

Emission Unit	PM Limit (lb/hr)	PM ₁₀ Limit (lb/hr)
EU-06a	4.47	4.47

Compliance with the above limits, combined with the limits in Conditions D.1.2 and D.2.2, and the potential to emit from other units at this source, shall limit the potential to emit of PM and PM₁₀ from the entire source to less than two hundred fifty (250) tons per twelve (12) consecutive month period each and render the requirements of PSD (326 IAC 2-2) not applicable to the source.

D.3.5 Emission Offset Minor Limits [326 IAC 2-3]

In order to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable, the Permittee shall comply with the following after control emissions limitations:

Emission Unit	PM _{2.5} Limit (lb/hr)
EU-06a	0.02

Compliance with the above limit, combined with the limits in Conditions D.1.2 and D.2.2, and the potential to emit from other units at this source, shall limit potential to emit of PM_{2.5} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period and render the requirements of Emission Offset (326 IAC 2-3) not applicable to the source.

D.3.6 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for the indoor blasting unit, identified as EU-06a, and its control device. 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 2-7-5(1)]

D.3.7 Particulate Control

- (a) In order to ensure compliance with Conditions D3.3, D.3.4 and D.3.5, the dust collector associated with the blasting unit (EU-06a) shall be in operation at all times blasting is being done inside the building in order to comply with this limit.
- (b) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (c) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas

temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

D.3.8 Testing Requirements [326 IAC 2-7-6(1), (6)][326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.3.5, the Permittee shall perform after-control PM_{2.5} testing of the one (1) abrasive blasting unit, identified as EU-06a, while it is operating inside the blast building. This test shall be performed no later than one hundred eighty (180) days after initial start-up of the indoor blasting, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to performance testing required by this condition. PM_{2.5} includes filterable and condensable PM_{2.5}.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.9 Visible Emissions Notations

- (a) Daily visible emission notations of the exhaust from the dust collector controlling emissions from the abrasive blasting unit, identified as EU-06a, while it is operating inside the blast building, shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response step(s). Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response step(s) required by this condition. Failure to take a response step(s) shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.3.10 Record Keeping Requirements

...

- (b) To document the compliance status with Condition D.3.9, the Permittee shall maintain daily records of the emission notations of the exhaust from the dust collector controlling the abrasive blast unit while it is operating inside the blast building, identified as EU-06a.

...

Additional Changes:

Change 1: IDEM, OAQ, revised the CAM portion of Section C.13 - Response to Excursions or Exceedances to provide clarity.

SECTION C SOURCE OPERATION CONDITIONS

...

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

...

C.13 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5][326 IAC 2-7-6]

...

- (II)
 - (a) CAM Response to excursions or exceedances.

 - (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2)(c) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
 - (1) Failed to address the cause of the control device performance problems; or
 - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

...

- (h) CAM recordkeeping requirements.
 - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(c), (d), (e), (f), and (g) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

...

Change 2: *IDEM added the rule citation 326 IAC 2-7-5(1) to the Compliance Determination Requirements subsection title in the Sections D.1 and D.2*

...

SECTION D.1 FACILITY OPERATION CONDITIONS

...

Compliance Determination Requirements [326 IAC 2-7-5(1)]

...

SECTION D.2 FACILITY OPERATION CONDITIONS

...

Compliance Determination Requirements [326 IAC 2-7-5(1)]

...

Change 3: *IDEM has revised Sections E.1 and E.2 for clarity.*

SECTION E.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(14)]:

- (b) Surface coating operations consisting of the following:
 - (1) Two (2) spray booths, identified as EU-02, for the application of weld-through (shop) primer when performing shipbuilding, with a maximum capacity of 600 marine vessels per year with emissions controlled by paint arrestor pads, identified as PA1 and PA2. Unit No. 1 was constructed in 1980. Unit No. 2 was constructed in 1970. Under 40 CFR 63, Subpart II, this is considered shipbuilding and repair.
 - (2) Outdoor spray operations, identified as EU-03, constructed in 1939, consisting of conventional, airless and electrostatic paint spray application methods, as well as brush and roller applications, with a maximum capacity of 600 marine vessels per year. A portion of the outdoor spray operations are conducted under cover that was installed in 2006. Under 40 CFR 63, Subpart II, this is considered shipbuilding and repair.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to NESHAP II [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.780, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1 **for the emissions units listed above, except as otherwise** specified in Table 1 of 40 CFR 63, Subpart II **and** in accordance with the schedule in 40 CFR 63, Subpart II.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

Indianapolis, Indiana 46201-2251

E.1.2 Shipbuilding and Ship Repair (Surface Coating) NESHAP [40 CFR 63, Subpart II][326 IAC 20-26]

~~The Permittee which engages in shipbuilding and ship repair is subject to the following provisions of 40 CFR 63, Subpart II,~~ **shall comply with the following provisions of 40 CFR Part 63, Subpart II, included as Attachment B to this permit and** which is incorporated by reference as 326 IAC 20-26-1 (included as Attachment B of the permit): **for the emission units listed above:**

...

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification. The staff recommend to the Commissioner that this Part 70 Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Deborah Cole at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5377 or toll free at 1-800-451-6027 ext. 4-5377.
- (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>.

Summary

Emission Unit	Uncontrolled PTE (ton/yr)							
	PM	PM10	PM2.5	VOC	SO2	CO	NOx	Total HAPs
EU-01: Pangborn Shot Blast Unit	1830.21	1573.98	1573.98	--	--	--	--	23.79
EU-01: Wheelabrator Shot Blast Unit	1689.43	1452.91	1452.91	--	--	--	--	21.96
EU-02: Spray Booth No. 1	145.22	145.22	145.22	--	--	--	--	--
EU-02: Spray Booth No. 2	145.22	145.22	145.22	--	--	--	--	--
Fugitive Emissions								
EU-03: Outdoor Spray Operations	432.21	432.21	432.21	391.75	--	--	--	120.88
EU-04: Welding Operations	40.22	40.22	40.22	--	--	--	--	34.50
EU-05: Flame and Plasma Cutting*	93.80	93.80	93.80	--	--	--	--	0.35
EU-06 and EU-06a: Four Abrasive Blasting Units***	1594.32	227.76	22.78	--	--	--	--	**
Paved and Unpaved Roads	**	**	**	--	--	--	--	--
Insignificant Activities								
Natural Gas Combustion	0.10	0.39	0.39	0.28	0.03	4.33	5.15	0.10
Gasoline Fuel Transfer and Dispensing Operation	--	--	--	**	--	--	--	**
Degreasing Operations	--	--	--	**	--	--	--	**
Total (fugitives only counted for HAPs)	3810.18	3317.73	3317.73	0.28	0.03	4.33	5.15	201.59

Emission Unit	Controlled PTE (ton/yr)							
	PM	PM10	PM2.5	VOC	SO2	CO	NOx	Total HAPs
EU-01: Pangborn Shot Blast Unit	7.32	6.30	15.74	--	--	--	--	0.10
EU-01: Wheelabrator Shot Blast Unit	6.76	5.81	14.53	--	--	--	--	0.09
EU-02: Spray Booth No. 1	1.45	1.45	1.45	--	--	--	--	--
EU-02: Spray Booth No. 2	1.45	1.45	1.45	--	--	--	--	--
Fugitive Emissions								
EU-03: Outdoor Spray Operations	432.21	432.21	432.21	391.75	--	--	--	120.88
EU-04: Welding Operations	40.22	40.22	40.22	--	--	--	--	34.50
EU-05: Flame and Plasma Cutting*	93.80	93.80	93.80	--	--	--	--	0.35
EU-06: Four Abrasive Blasting Units***	1594.32	227.76	22.78	--	--	--	--	**
Paved and Unpaved Roads	**	**	**	--	--	--	--	--
Insignificant Activities								
Natural Gas Combustion	0.10	0.39	0.39	0.28	0.03	4.33	5.15	0.10
Gasoline Fuel Transfer and Dispensing Operation	--	--	--	**	--	--	--	**
Degreasing Operations	--	--	--	**	--	--	--	**
Total (fugitives only counted for HAPs)	17.08	15.40	33.56	0.28	0.03	4.33	5.15	156.01

Emission Unit	Limited PTE (ton/yr)							
	PM	PM10	PM2.5	VOC	SO2	CO	NOx	Total HAPs
EU-01: Pangborn Shot Blast Unit	39.70	39.70	39.70	--	--	--	--	23.79
EU-01: Wheelabrator Shot Blast Unit	39.70	39.70	39.70	--	--	--	--	21.96
EU-02: Spray Booth No. 1	10.00	10.00	10.00	--	--	--	--	--
EU-02: Spray Booth No. 2	10.00	10.00	10.00	--	--	--	--	--
EU-06a - Blasting Emissions inside Blast Building	19.60	19.60	0.09	--	--	--	--	--
Fugitive Emissions								
EU-03: Outdoor Spray Operations	432.21	432.21	432.21	391.75	--	--	--	120.88
EU-04: Welding Operations	40.22	40.22	40.22	--	--	--	--	34.50
EU-05: Flame and Plasma Cutting*	93.80	93.80	93.80	--	--	--	--	0.35
EU-06: Four Abrasive Outdoor Blasting Units***	1594.32	227.76	22.78	--	--	--	--	**
Paved and Unpaved Roads	**	**	**	--	--	--	--	--
Insignificant Activities								
Natural Gas Combustion	0.10	0.39	0.39	0.28	0.03	4.33	5.15	0.10
Gasoline Fuel Transfer and Dispensing Operation	--	--	--	**	--	--	--	**
Degreasing Operations	--	--	--	**	--	--	--	**
Total (fugitives only counted for HAPs)	119.10	119.39	99.88	0.28	0.03	4.33	5.15	201.59

*Emissions taken from Part 70 Significant Permit Modification No.: T019-34921-00006, issued on December 8, 2014.

**Calculations not provided or emissions not estimated. The emissions that were not calculated are not expected to trigger the exceedance of any thresholds.

*** Abrasive blasting emissions are fugitive only when units are operating outdoors.

GHGs (CO2e)
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--
1246.01
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--
--
6220.28
--
--
7466.29

GHGs (CO2e)
--
--
--
--
--
1246.01
**
--
--
6220.28
--
--
7466.29

GHGs (CO2e)
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1246.01
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6220.28
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7466.29

EU-01 - Blasting Emissions

Emission Unit	Baghouse ID	Baghouse Air Flow (acfm) [1]	Outlet PM Grain Loading (gr/acfm) [1]	Baghouse Control Efficiency (PM/PM10/Mn) [1]	Baghouse Control Efficiency (PM2.5) [2]	Controlled PTE PM (ton/yr) [3]	Uncontrolled PTE PM (ton/yr) [4]	Uncontrolled PTE PM10/PM2.5 (ton/yr) [5]	Controlled PTE PM10 (ton/yr) [6]	Controlled PTE PM2.5 (ton/yr) [6]	Uncontrolled PTE Mn (ton/yr) [7]	Controlled PTE Mn (ton/yr) [6]
Shotblast #1 (Pangborn)	BH-1	13000	0.015	99.6%	99.0%	7.32	1830.21	1573.98	6.30	15.74	23.79	0.10
Shotblast #2 (Wheelabrator)	BH-2	12000	0.015	99.6%	99.0%	6.76	1689.43	1452.91	5.81	14.53	21.96	0.09
Total						14.08	3519.64	3026.89	12.11	30.27	45.76	0.18

Methodology

[1] Design

[2] PM2.5 Control Efficiency assumed to be lower than PM/PM10/Mn

[3] Controlled PTE PM (ton/yr) = Baghouse Air Flow (acfm) x Outlet PM Grain Loading (gr/acfm) x (60 min/hr) x (8760 hr/yr) x (1 lb/7000 gr) x (1 ton/2000 lb)

[4] Uncontrolled PTE PM (ton/yr) = Controlled PTE PM (ton/yr) / (1 - Baghouse Control Efficiency)

[5] Uncontrolled PTE PM10/PM2.5 (ton/yr) = Uncontrolled PTE PM (ton/yr) x 0.86 ton PM10/ton PM; Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition); PM2.5 assumed to equal PM10

[6] Controlled PTE (ton/yr) = Uncontrolled PTE (ton/yr) x (1 - Control Efficiency)

[7] Uncontrolled PTE MN (ton/yr) = Uncontrolled PTE PM (ton/yr) x 0.013 ton Mn/ton PM; the Mn fraction is based conservatively on the MSDS from the steel shot

326 IAC 6-3-2(e) Allowable Rate of Emissions

Abrasive Blasting Booth	Process Rate (materials throughput) (lbs/hr)	Process Weight Rate (tons/hr)	Allowable PM Emissions (lbs/hr)	Allowable PM Emissions (tons/yr)
TOTAL	160	0.080	0.755	3.306

Methodology

Allowable Emissions (E) (lb/hr) = 4.10(Process Weight Rate)^{0.67}

Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)*8760)/2000

EU-02 and EU-03 - Coating Emissions

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/year)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (ton/yr)	Uncontrolled PTE PM/PM10/PM2.5 (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Particulate Control Efficiency	Controlled PTE PM/PM10/P M2.5 (ton/yr)
EU-02: Spray Booth #1																
Preprime Part A (Potassium Silicate, PC-1200, 8-1805072)	9.2	73.00%	73.0%	0.0%	73.0%	27.00%	97.6	600.0	0.00	0.00	0.00	18.13	0.00	75%	99%	0.18
Preprime Part B (zinc dust, PC-1201, 8-1805096)	48.5	0.00%	0.0%	0.0%	0.0%	100.00%	35.0	600.0	0.00	0.00	0.00	127.09	0.00	75%	99%	1.27
EU-02: Spray Booth #2																
Preprime Part A (Potassium Silicate, PC-1200, 8-1805072)	9.2	73.00%	73.0%	0.0%	73.0%	27.00%	97.6	600.0	0.00	0.00	0.00	18.13	0.00	75%	99%	0.18
Preprime Part B (zinc dust, PC-1201, 8-1805096)	48.5	0.00%	0.0%	0.0%	0.0%	100.00%	35.0	600.0	0.00	0.00	0.00	127.09	0.00	75%	99%	1.27
EU-03: Outdoor Spray Operations																
Devoe Haze Gray Base (8-1802222)	11.85	20.5%	0.0%	20.5%	0.0%	65.56%	538.2	600.0	2.43	2.43	391.75	395.56	3.70	74%	0%	395.56
Devoe Black (8-1802441)	11.69	19.9%	0.0%	19.9%	0.0%	66.55%	538.2	600.0	2.33	2.33	376.36	392.85	3.50	74%	0%	392.85
Valspar Grey (8-1807444)	12.27	16.1%	0.0%	16.1%	0.0%	72.38%	538.2	600.0	1.98	1.98	319.31	432.21	2.73	74%	0%	432.21
Devoe Buff Base (8-1805235)	11.83	20.2%	0.0%	20.2%	0.0%	66.03%	538.2	600.0	2.39	2.39	386.06	396.20	3.62	74%	0%	396.20
Devoe Oxide Red Base (8-1802350)	11.85	20.3%	0.0%	20.3%	0.0%	65.72%	538.2	600.0	2.40	2.41	389.54	396.69	3.65	74%	0%	396.69
Worst Case for EU-03											391.75	432.21				432.21
Total											391.75	722.65				435.12

Methodology

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/yr) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 Gallons of Material per Unit is based on volume of coatings used in 1995 for 235 barges

Material	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum (unit/year)	Weight % Ethylbenzene	Weight % Xylene	Weight % Formaldehyde	Ethylbenzene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Total HAPs (ton/yr)
EU-02: Spray Booth #1										
Preprime Part A (Potassium Silicate, PC-1200, 8-1805072)	9.2	97.6	600.0				0.00	0.00	0.00	0.00
Preprime Part B (zinc dust, PC-1201, 8-1805096)	48.5	35.0	600.0				0.00	0.00	0.00	0.00
EU-02: Spray Booth #2										
Preprime Part A (Potassium Silicate, PC-1200, 8-1805072)	9.2	97.6	600.0				0.00	0.00	0.00	0.00
Preprime Part B (zinc dust, PC-1201, 8-1805096)	48.5	35.0	600.0				0.00	0.00	0.00	0.00
EU-03: Outdoor Spray Operations										
Devoe Haze Gray Base (8-1802222)	11.85	538.2	600.0				0.00	0.00	0.00	0.00
Devoe Black (8-1802441)	11.69	538.2	600.0				0.00	0.00	0.00	0.00
Valspar Grey (8-1807444)	12.27	538.2	600.0	1.00%	5.00%	0.10%	19.82	99.08	1.98	120.88
Devoe Buff Base (8-1805235)	11.83	538.2	600.0				0.00	0.00	0.00	0.00
Devoe Oxide Red Base (8-1802350)	11.85	538.2	600.0				0.00	0.00	0.00	0.00
Worst Case for EU-03							19.82	99.08	1.98	120.88

"Worst Case" Individual HAP 99.1
"Worst Case" Total HAPs 120.9

Methodology

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/yr) * Weight % HAP * 1 ton/2000 lbs

EU-03 - Coating Emissions

Material	Density of Coating (lb/gal)	Percent VOC (%)	Percent Solids (%)	Gal of Mat. (gal/unit)	Gal of Mat. (gal of coating solids/unit)	Maximum (unit/year) ²	Pounds VOC per gallon of coating less water	Equivalent Pounds VOC per gallon of coating solids ³	PTE VOC (ton/yr)
EU-03: Outdoor Spray Operations									
Antifouling Coating - Discontinued Indiana Compliant Coating ¹	19.85	14.26%	61%	220.0	134.2	4.0	2.83	4.64	1.25
Antifouling Coating - Discontinued Indiana Compliant Coating ¹	19.85	14.26%	61%	170.0	103.7	10.0	2.83	4.64	2.41
Total for EU-03 (Discontinued Indiana Compliant Coating)									3.65
Antifouling Coating - Proposed Coating ⁴	18.01	17.82%	60%	223.7	134.2	4.0	3.21	5.35	1.44
Antifouling Coating - Proposed Coating ⁴	18.01	17.82%	60%	172.8	103.7	10.0	3.21	5.35	2.77
Total for EU-03 (Proposed Coating)									4.21
Antifouling Coating - Site-Specific RACT Limit ⁵	NA	NA	NA	NA	NA	NA	3.33	6.08	1.63
Antifouling Coating - Site-Specific RACT Limit ⁵	NA	NA	NA	NA	NA	NA	3.33	6.08	3.15
Total for EU-03 (Site-Specific RACT Limit)									4.79

Increase in PTE between Discontinued Indiana Compliant Coating and Proposed Coating (tons/yr) 0.56
Increase in PTE between Discontinued Indiana Compliant Coating and Site-Specific RACT Limit (tons/yr) 1.13

Notes

- ¹ Gallons of Material per Unit is based on volume of coatings used in 1995 for 235 barges. The source currently coats two different types of barges, each requiring a different amount of coatings applied.
- ² Per the source this is the maximum number of the two barge types that require an antifouling coating that can be produced in a calendar year.
- ³ Per U.S. EPA guidance, VOC equivalency calculations must be made on a solid basis. The amount of solids needed to coat a surface to a particular film thickness is the same regardless of the coating composition used. Reducing the solids content of an organic solvent-borne coating increases the quantity of coating required and increases VOC emissions because more coating is used and the coating has a higher VOC content. (Source: "A Guideline for Surface Coating Calculations," EPA-340/1-86-016, July 1986, Page 16.)
- ⁴ The source is proposing to use the following coating since the previous coating they used that was in compliance with the Indiana limit is no longer available. Per note number 3 IDEM has assumed the source will use more coating due to the higher VOC content.
- ⁵ The source is allowed to emit up to 3.33 lbs of VOC per gallon of coating or 6.08 lbs of VOC per gallon of coating solids pursuant to the Commissioner's Order and Variance. Therefore, the potential to emit of this modification will be determined based on the increase in emissions from complying with the new Site-Specific RACT limit versus the emissions from the discontinued coating.
 NA = Not Applicable

Methodology

Discontinued Indiana Compliant Coating Calculations

Gal of Mat. (gal of coating solids/unit) = Percent Solids (%) x Gal of Mat. (gal/unit)
 Equivalent Pounds VOC/Gallon of Coating Solids = Density of Coating (lb/gal) x Percent VOC (%) x 1/Percent Solids (%)
 PTE VOC (tons/yr) = Gal of Mat. (gal of coating/unit) x Maximum (units/yr) x Pounds VOC/Gallon of Coating Less Water x 1/2,000 (ton/lb)

Proposed Coating Calculations

Gal of Mat. (gal of coating/unit) = Gal of Mat. of Discontinued Coating (gal of coating solids/unit) / Percent Solids of Proposed Coating (%)
 Gal of Mat. (gal of coating solids/unit) = Percent Solids (%) x Gal of Mat. (gal/unit)
 Pounds VOC/Gallon of Coating Solids = Density of Coating (lb/gal) x Percent VOC (%) x 1/Percent Solids (%)
 PTE VOC (tons/yr) = Gal of Mat. (gal of coating/unit) x Maximum (units/yr) x Pounds VOC/Gallon of Coating Less Water x 1/2,000 (ton/lb)

Site-Specific RACT Limit Calculations

Equivalent limit in pounds of VOC per gallon of coating solids as applied calculated using the formula in 326 IAC 8-1-2(b)(1).
 Equivalent Pounds VOC/Gallon of Coating Solids = VOC (lbs/gal of coating less water) * [1 - (VOC (lbs/gal of coating less water) * [1/7.36 (baseline lb VOC/gallon of solvent)])]
 PTE VOC (tons/yr) = Equivalent Limit (lbs VOC/gal of coating solids) / Equivalent Pounds VOC/Gallon of Coating Solids of Discontinued Indiana Compliant Coating * PTE VOC Discontinued Indiana Compliant Coating (ton/yr)

Increase in PTE between Discontinued Indiana Compliant Coating and Proposed Coating (tons/yr) = Total PTE for EU-03 (Proposed Coating) - Total PTE for EU-03 (Discontinued Indiana Compliant Coating)
 Increase in PTE between Discontinued Indiana Compliant Coating and Site-Specific RACT Limit (tons/yr) = Total PTE for EU-03 (Site-Specific RACT Limit) - Total PTE for EU-03 (Discontinued Indiana Compliant Coating)

EU-04 - Welding Emissions

Welding Process and Electrode Type	Class	WM#	Total Actual Electrode Weight (lb/yr)	%Waste	Actual Electrode Consumed (lb/yr)	Potential Electrode Consumed (lb/yr)	EMISSION FACTORS*						EMISSIONS						HAPs (lb/hr)
							(lb pollutant/1000 lb electrode consumed)						(lbs/hr)						
							PM/PM10/PM2.5	Cr	Co	Mn	Ni	Pb	PM/PM10/PM2.5	Cr	Co	Mn	Ni	Pb	
Shielded Metal Arc Welding (SMAW)																			
E308	308	1087	7,216	30%	5051.2	15951.2	10.8	7.52	0.01	2.52	0.43		0.020	1.37E-02	1.82E-05	4.59E-03	7.83E-04	0.00E+00	0.019
E309**	309	1058	10,760	30%	7532	23785.3	38.4	44.1	0.01	22	1.96	1.62	0.104	1.20E-01	2.72E-05	5.97E-02	5.32E-03	4.40E-03	0.189
E316	316	1087	0	30%	0	0	10.0	8.54		5.44	0.55		0.000	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.000
E6010	6010	1006	71,150	30%	49805	157278.9	25.6	0.04		9.91	0.04		0.460	7.18E-04	0.00E+00	1.78E-01	7.18E-04	0.00E+00	0.179
E6011	6011	1007	103,550	30%	72485	228900.0	38.4	0.05	0.01	9.98	0.05		1.003	1.31E-03	2.61E-04	2.61E-01	1.31E-03	0.00E+00	0.264
E6013	6013	1008	25	30%	17.5	55.3	19.7	0.04	0.01	9.45	0.02		0.000	2.52E-07	6.31E-08	5.96E-05	1.26E-07	0.00E+00	0.000
E6027**	6027	1004	94,000	30%	65800	207789.5	38.4	44.1	0.01	22	1.96	1.62	0.911	1.05E+00	2.37E-04	5.22E-01	4.65E-02	3.84E-02	1.653
E7018	7018	1027	11,150	30%	7805	24647.4	18.4	0.06	0.01	10.3	0.02		0.052	1.69E-04	2.81E-05	2.90E-02	5.63E-05	0.00E+00	0.029
E7024	7024	1005	115,300	30%	80710	254873.7	9.2	0.01		6.29			0.268	2.91E-04	0.00E+00	1.83E-01	0.00E+00	0.00E+00	0.183
E7024-1**	7024-1	1004	143,150	30%	100205	316436.8	38.4	44.1	0.01	22	1.96	1.62	1.387	1.59E+00	3.61E-04	7.95E-01	7.08E-02	5.85E-02	2.517
Flux Cored Arc Welding (FCAW)																			
E71T	71M	1080	199,502	15%	169576.7	535505.4	12.2	0.02	0.01	6.62	0.04		0.746	1.22E-03	6.11E-04	4.05E-01	2.45E-03	0.00E+00	0.409
E70T	AWSL12	1034	29,100	15%	24735	78110.5	15.1	0.04		8.91	0.05		0.135	3.57E-04	0.00E+00	7.94E-02	4.46E-04	0.00E+00	0.080
E71T	FABCO	1065	10,020	15%	8517	26895.8	12.2	0.02	0.01	6.62	0.04		0.037	6.14E-05	3.07E-05	2.03E-02	1.23E-04	0.00E+00	0.021
E70T	NR131	1088	0	15%	0	0.0	15.1	0.04		8.91	0.05		0.000	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.000
E71T	NR232	1011	464,825	15%	395101.25	1247688.2	12.2	0.02	0.01	6.62	0.04		1.738	2.85E-03	1.42E-03	9.43E-01	5.70E-03	0.00E+00	0.953
E70T	NR305	1091	494,400	15%	420240	1327073.7	15.1	0.04		8.91	0.05		2.288	6.06E-03	0.00E+00	1.35E+00	7.57E-03	0.00E+00	1.363
E70T	NR 233		6,000	15%	5100	16105.3	15.1	0.04		8.91	0.05		0.028	7.35E-05	0.00E+00	1.64E-02	9.19E-05	0.00E+00	0.017
Submerged Arc Welding (SAW)																			
EL12	L56	1095	6,968	15%	5922.8	18703.6	0.05						1.07E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.000
EL12	L-60	1025	25,600	15%	21760	68715.8	0.05						3.92E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.000
EM12K	L61	1085	220,800	15%	187680	592673.7	0.05						3.38E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.000
WM1093	LC-72		16,850	15%	14322.5	45228.9	0.05						2.58E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.000
E70C-6M	MC706		143,031	15%	121576.35	383925.3	0.05						2.19E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.000
Total (lb/hr)													9.18	2.79	0.003	4.85	0.14	0.10	7.88
Total (ton/yr)													40.22	12.20	0.01	21.22	0.62	0.44	34.50

Methodology

*Emission Factors are from AP-42, Chapter 12.19, Tables 12.19-1 and 12.19-2

**Emission Factors for this type of electrode was not included in AP-42. Emission Factors are conservative based on other electrodes reported in AP-42.

Total Actual Electrode Weight is as reported by Permittee

Actual Electrode Consumed (lb/yr) = Total Actual Electrode Weight (lb/yr) x (1 - %Waste)

Potential Electrode Consumed (lb/yr) = Actual Electrode Consumed (lb/yr) x (600 Potential Ships/yr) / (190 Actual Ships/yr)

Welding emissions (lb/hr) = (Potential Electrode Consumed (lb/yr) x (emission factor (lb pollutant/1000 lb of electrode used))) x (1 yr/8760 hr) / 1000

Emissions (ton/yr) = Emissions (lb/hr) x (8760 hr/yr) x (1 ton/2000 lb)

Note: These represent indoor welding emissions as well as outdoor fugitive welding emissions. The Permittee did not separate out the indoor (EU-08) from the outdoor (EU-04) welding operation

EU-04 - GHG Emissions from Welding

2010 Actual Emissions

Welding Gas	# Tanks	Weight per tank (lbs)	2010 Usage (tons/yr)	CO2	N2O	CH4	GHG Mass-Based	CO2e
Welder Supply Cryogenic (Liquid) Carbon Dioxide	220	387.000	42.57	42.57			42.57	42.57
Linde Liquid Carbon Dioxide			352.00	352.00			352.00	352.00
Total				394.57	0.00	0.00	394.57	394.57

Potential Emissions

Welding Gas	# Tanks	Weight per tank (lbs)	Potential Usage (tons/yr)	CO2	N2O	CH4	GHG Mass-Based	CO2e
Welder Supply Cryogenic (Liquid) Carbon Dioxide	220	387.000	134.43	134.43			134.43	134.43
Linde Liquid Carbon Dioxide			1,111.58	1,111.58			1,111.58	1,111.58
Total				1,246.01	0.00	0.00	1,246.01	1,246.01

Methodology

Emission estimation methodology based on:

DARCO Industries Inc., Voluntary Challenge and Registry Action Plan for Reducing Greenhouse Gas Emissions

<http://www.ghgregistries.ca/registry/out/C5562-DACRO-04-PDF.PDF>

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298)

EU-06 -Outdoor Blasting Emissions and EU-06-Indoor Blasting Emissions

Emission Unit	Maximum Usage (lb/hr)	PM Emission Factor (lb/1000 lb)	PM10 Emission Factor (lb/1000 lb)	PM2.5 Emission Factor (lb/1000 lb)	Uncontrolled PM (ton/yr)	Uncontrolled PM10 (ton/yr)	Uncontrolled PM2.5 (ton/yr)	PM Control Efficiency (%)	PM10/PM2.5 Control Efficiency (%)	Controlled PM (ton/yr)	Controlled PM10 (ton/yr)	Controlled PM2.5 (ton/hr)
4 portable shot blast units - (sand or grit blast media)	4,000	91	13	1.3	1594.32	227.76	22.78	50.00%	65%	797.16	79.72	7.97

PM, PM10, and PM2.5 Emission Factors from AP-42, Compilation of Air Emission Factors, Chapter 13.2.6, Table 13.2.6-1. Emission factors are worst case for media (sand) and wind speed (15mph).

Methodology:

Uncontrolled Emissions (ton/yr) = Maximum Usage (lb/hr) * (8760 hr/yr) * Emission Factor (lb/1000 lb) * (1 ton/2000 lb) / 1000

Controlled Emissions (ton/yr) = Uncontrolled Emissions (ton/yr) * (1 - Control Efficiency)

Control based on dust suppressant manufacturer's estimate

The PTE did not change due to the change in location of because the same maximum capacity of the blast units are maintained whether the operation is outdoor or inside a building.

Natural Gas Combustion (< 100 MMBtu/hr)

			Criteria Pollutants					GHGs						
Emission Factor in lb/MMCF			PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO	CO2	CH4	N2O	GHG Mass-Based	CO2e
			1.9	7.6	7.6	0.6	100.0	5.5	84.0	120000	2.3	2.2		
							**see below							
Emission Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)											
Water-Dry Oven	1	8.588	0.008	0.033	0.033	0.003	0.429	0.024	0.361	515.29	0.01	0.01	515.31	518.36
Water-Dry Oven	1	8.588	0.008	0.033	0.033	0.003	0.429	0.024	0.361	515.29	0.01	0.01	515.31	518.36
Pre-Dry Oven	1	8.588	0.008	0.033	0.033	0.003	0.429	0.024	0.361	515.29	0.01	0.01	515.31	518.36
Pre-Dry Oven	1	8.588	0.008	0.033	0.033	0.003	0.429	0.024	0.361	515.29	0.01	0.01	515.31	518.36
Dry Oven	1	8.588	0.008	0.033	0.033	0.003	0.429	0.024	0.361	515.29	0.01	0.01	515.31	518.36
Dry Oven	1	8.588	0.008	0.033	0.033	0.003	0.429	0.024	0.361	515.29	0.01	0.01	515.31	518.36
Furnace	3	25.765	0.024	0.098	0.098	0.008	1.288	0.071	1.082	1,545.88	0.03	0.03	1,545.94	1,555.07
Furnace	3	25.765	0.024	0.098	0.098	0.008	1.288	0.071	1.082	1,545.88	0.03	0.03	1,545.94	1,555.07
Total			0.10	0.39	0.39	0.03	5.15	0.28	4.33	6183.53	0.12	0.11	6,183.76	6,220.28

*PM emission factor is filterable PM only. PM10 and PM2.5 emission factors are filterable and condensable particulate combined.

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

			HAPs - Organics					HAPs - Metals					Total HAPs
Emission Factor in lb/MMCF			Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Lead	Cadmium	Chromium	Manganese	Nickel	
			2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	1.8880
Emission Unit	Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Potential Emissions (tons/yr)										
Water-Dry Oven	1	8.588	9.0E-06	5.2E-06	3.2E-04	7.7E-03	1.5E-05	2.1E-06	4.7E-06	6.0E-06	1.6E-06	9.0E-06	8.1E-03
Water-Dry Oven	1	8.588	9.0E-06	5.2E-06	3.2E-04	7.7E-03	1.5E-05	2.1E-06	4.7E-06	6.0E-06	1.6E-06	9.0E-06	8.1E-03
Pre-Dry Oven	1	8.588	9.0E-06	5.2E-06	3.2E-04	7.7E-03	1.5E-05	2.1E-06	4.7E-06	6.0E-06	1.6E-06	9.0E-06	8.1E-03
Pre-Dry Oven	1	8.588	9.0E-06	5.2E-06	3.2E-04	7.7E-03	1.5E-05	2.1E-06	4.7E-06	6.0E-06	1.6E-06	9.0E-06	8.1E-03
Dry Oven	1	8.588	9.0E-06	5.2E-06	3.2E-04	7.7E-03	1.5E-05	2.1E-06	4.7E-06	6.0E-06	1.6E-06	9.0E-06	8.1E-03
Dry Oven	1	8.588	9.0E-06	5.2E-06	3.2E-04	7.7E-03	1.5E-05	2.1E-06	4.7E-06	6.0E-06	1.6E-06	9.0E-06	8.1E-03
Furnace	3	25.765	2.7E-05	1.5E-05	9.7E-04	2.3E-02	4.4E-05	6.4E-06	1.4E-05	1.8E-05	4.9E-06	2.7E-05	2.4E-02
Furnace	3	25.765	2.7E-05	1.5E-05	9.7E-04	2.3E-02	4.4E-05	6.4E-06	1.4E-05	1.8E-05	4.9E-06	2.7E-05	2.4E-02
Total			1.1E-04	6.2E-05	3.9E-03	9.3E-02	1.8E-04	2.6E-05	5.7E-05	7.2E-05	2.0E-05	1.1E-04	9.7E-02

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

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

Methodology

Heating Value of Natural Gas is assumed to be 1020 MMBtu/MMCF

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

Potential Emission (tons/yr) = Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * (1 ton/2,000 lb)

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (25) + N2O Potential Emission ton/yr x N2O GWP (298).



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

July 14, 2016
Jeffboat, LLC
019-36951-00006

Dear Concerned Citizen(s):

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

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

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

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

Enclosure
PN AAA Cover.dot 2/17/2016



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Carol S. Comer
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

July 14, 2016

A 30-day public comment period has been initiated for:

Permit Number: 019-36951-00006
Applicant Name: Jeffboat, LLC
Location: Jeffersonville, Clark County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

<http://www.in.gov/ai/appfiles/idem-caats/>

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification.dot 2/17/2016



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

July 14, 2016

Mr. Will Tucker
Jeffboat, LLC
1030 E Market Street
Jeffersonville, IN 47130

Re: Public Notice
Jeffboat, LLC
Permit Level: Significant Permit Modification
Permit Number: 019-36951-00006

Dear Mr. Tucker:

Enclosed is a copy of your draft Significant Permit Modification, 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 Evening News in Jeffersonville, Indiana publish the abbreviated version of the public notice no later than July 18, 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 Jeffersonville Township Public Library, 211 East Court Avenue in Jeffersonville, Indiana. 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 Deborah Cole, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5377 or dial (317) 234-5377.

Sincerely,

Greg Hotopp

Greg Hotopp
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

July 14, 2016

To: Jeffersonville Township Public Library

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: Jeffboat, LLC
Permit Number: 019-36951-00006

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



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

July 14, 2016

Evening News
221 Spring Street
Jeffersonville, IN 47130

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Jeffboat, LLC, Clark 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 July 18, 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 Greg Hotopp at 800-451-6027 and ask for extension 4-3493 or dial 317-234-3493.

Sincerely,

Greg Hotopp

Greg Hotopp
Permit Branch
Office of Air Quality

Permit Level: Significant Permit Modification
Permit Number: 019-36951-00006

Enclosure

PN Newspaper.dot 2/17/2016

Mail Code 61-53

IDEM Staff	GHOTOPP 7/14/2016 Jeffboat, LLC 019-36951-00006 Draft		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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		Will Tucker Jeffboat, LLC 1030 E Market Street Jeffersonville IN 47130 (Source CAATS)										
2		Patrick Sutton Vice President Jeffboat, LLC 1030 E Market Street Jeffersonville IN 47130 (RO CAATS)										
3		Ms. Rhonda England 17213 Persimmon Run Rd Borden IN 47106-8604 (Affected Party)										
4		Ms. Betty Hislip 602 Dartmouth Drive, Apt 8 Clarksville IN 47129 (Affected Party)										
5		Jeffersonville City Council and Mayors Office 500 Quarter Master Jeffersonville IN 47130 (Local Official)										
6		Jeffersonville Twp Public Library 211 E Court Ave, P.O. Box 1548 Jeffersonville IN 47131-1548 (Library)										
7		Clark County Board of Commissioners 501 E. Court Avenue Jeffersonville IN 47130 (Local Official)										
8		Clark County Health Department 1320 Duncan Avenue Jeffersonville IN 47130-3723 (Health Department)										
9		Mrs. Kathy Moore Keramida Environmental, Inc. 401 North College Indianapolis IN 46202 (Consultant)										
10												
11												
12												
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 Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual 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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