



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Federally Enforceable State Operating Permit (FESOP)

for Girtz Industries, Inc. in White County

FESOP Renewal No.: F181-37056-00038

The Indiana Department of Environmental Management (IDEM) has received an application from Girtz Industries, Inc. located at 5262 N. East Shafer Drive, Monticello, Indiana 47960 for a renewal of its FESOP issued on January 12, 2012. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Girtz Industries, Inc. to continue to operate its existing source.

This draft FESOP Renewal does not contain any new equipment that would emit air pollutants, and no conditions from previously issued permits/approvals have been changed.

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

Monticello-Union Township Public Library
321 West Broadway Street
Monticello, IN 47960

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

How can you participate in this process?

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number F181-37056-00038 in all correspondence.

Comments should be sent to:

Amal Agharkar
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 2-8422
Or dial directly: (317) 232-8422
Fax: (317) 232-6749 attn: Amal Agharkar
E-mail: aagharka@idem.IN.gov

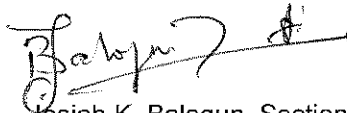
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have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

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

What will happen after IDEM makes a decision?

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

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



Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

DRAFT

Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Girtz Industries, Inc.
5262 N. East Shafer Drive
Monticello, Indiana 47960**

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

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

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

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

Operation Permit No.: F181-37056-00038	
Issued by: Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	5
A.1	General Information [326 IAC 2-8-3(b)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]	
A.4	FESOP Applicability [326 IAC 2-8-2]	
SECTION B	GENERAL CONDITIONS	8
B.1	Definitions [326 IAC 2-8-1]	
B.2	Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-8-6] [IC 13-17-12]	
B.5	Severability [326 IAC 2-8-4(4)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7	Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8	Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9	Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10	Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11	Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]	
B.12	Emergency Provisions [326 IAC 2-8-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14	Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.16	Permit Renewal [326 IAC 2-8-3(h)]	
B.17	Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.18	Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.19	Source Modification Requirement [326 IAC 2-8-11.1]	
B.20	Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]	
B.21	Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.22	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]	
B.23	Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS.....	18
	Emission Limitations and Standards [326 IAC 2-8-4(1)]	18
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Overall Source Limit [326 IAC 2-8]	
C.3	Opacity [326 IAC 5-1]	
C.4	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6	Fugitive Dust Emissions [326 IAC 6-4]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-8-4(3)].....	20
C.9	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	21
C.10	Compliance Requirements [326 IAC 2-1.1-11]	
	Compliance Monitoring Requirements [326 IAC 2-8-4(1)][326 IAC 2-8-5(a)(1)]	21
C.11	Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]	
C.12	Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]	

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]	21
C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]	
C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]	
C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]	
C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]	
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]	23
C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]	
C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]	
Stratospheric Ozone Protection	24
C.19 Compliance with 40 CFR 82 and 326 IAC 22-1	
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS	25
Emission Limitations and Standards [326 IAC 2-8-4(1)]	25
D.1.1 Miscellaneous Metal and Plastic Parts Coating Operations Limitations [326 IAC 8-2-9]	
D.1.2 FESOP Limit [326 IAC 2-8-4]	
D.1.3 Hazardous Air Pollutants (HAPs) Minor Limits [326 IAC 2-8-4][326 IAC 2-4.1]	
D.1.4 Particulate Emission Limitations for Work Practices and Control Technologies [326 IAC 6-3-2(d)]	
D.1.5 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]	
D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 1-6-3]	
Compliance Determination Requirements [326 IAC 2-8-4(1)].....	27
D.1.7 Volatile Organic Compounds [326 IAC 8-1-2][326 IAC 8-1-4]	
D.1.8 Particulate Control	
Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)].....	28
D.1.9 Monitoring	
D.1.10 Parametric Monitoring	
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]	28
D.1.11 Record Keeping Requirements	
D.1.12 Reporting Requirements	
SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS	30
Emission Limitations and Standards [326 IAC 2-8-4(1)]	30
D.2.1 FESOP Limits [326 IAC 2-8-4]	
D.2.2 Prevention of Significant Deterioration (PSD) Limits [326 IAC 2-2]	
D.2.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]	
D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 1-6-3]	
Compliance Determination Requirements [326 IAC 2-8-4(1)].....	31
D.2.5 Particulate Control	
D.2.6 Broken or Failed Bag/Cartridge Detection	
Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)].....	32
D.2.7 Visible Emissions Notations	
D.2.8 Cartridge Filtration Parametric Monitoring	
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]	32
D.2.9 Record Keeping Requirements	
SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS	34
Emission Limitations and Standards [326 IAC 2-8-4(1)]	34
D.3.1 FESOP Limits [326 IAC 2-8-4]	
D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 1-6-3]	

Compliance Determination Requirements [326 IAC 2-8-4(1)]	35
D.3.3 Multiple Fuel Compliance Calculation [326 IAC 2-8-4(1)]	
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]	35
D.3.4 Record Keeping Requirements	
D.3.5 Reporting Requirements	
SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS	36
Emission Limitations and Standards [326 IAC 2-8-4(1)]	36
D.4.1 Incinerators [326 IAC 4-2-2]	
D.4.2 Carbon Monoxide Emission limits [326 IAC 9-1-2]	
D.4.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 1-6-3]	
SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS	38
Emission Limitations and Standards [326 IAC 2-8-4(1)]	38
D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]	
D.5.2 Material Requirements Cold Cleaner Degreasers [326 IAC 8-3-8]	
D.5.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 1-6-3]	
D.5.4 Record Keeping Requirements	
SECTION E.1 NSPS	40
New Source Performance Standards (NSPS) Requirements [326 IAC 2-8-4(1)]	40
E.1.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR Part 60, Subpart A]	
E.1.2 New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines [326 IAC 12][40 CFR Part 60, Subpart IIII]	
SECTION E.2 NESHAP	42
National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-8-4(1)]	42
E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]	
E.2.2 National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [40 CFR Part 63, Subpart ZZZZ][326 IAC 20-82]	
SECTION E.3 NSPS	44
New Source Performance Standards (NSPS) Requirements [326 IAC 2-8-4(1)]	44
E.3.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR Part 60, Subpart A]	
E.3.2 New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines [326 IAC 12][40 CFR Part 60, Subpart JJJJ]	
CERTIFICATION	45
EMERGENCY OCCURRENCE REPORT	46
FESOP Quarterly Report	48
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT	53

SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary manufacturing metal enclosures and skid bases for power packaging and performing diesel generator quality assurance testing.

Source Address:	5262 N. East Shafer Drive, Monticello, Indiana 47960
General Source Phone Number:	(574) 278-7510
SIC Code:	3444 (Sheet Metal Work)
County Location:	White
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) spray paint booth, identified as SB-1, constructed in 1997, utilizing an air assisted airless spray system (HVLPP), with a maximum throughput of 0.17 metal containers per hour, and approved in 2014 for modification to add a new hand-held spray gun and associated mixing equipment for the application of spray insulation foam, with a maximum capacity of 0.25 metal skids per hour, controlled with a highloft poly filter for particulate control which exhausts to stack S1 with a maximum flow rate of 30,000 acfm.
- (b) One (1) powder spray booth, identified as PCB-1, constructed in 1997, utilizing electrostatic spray gun, equipped with cartridge filtration system, exhausting inside, maximum capacity; 24 units per day, 2,000 lbs per unit and using 20.2 pounds of powder per hour, with a process throughput of 1.0 tons per hour.
- (c) Abrasive Blasters:
 - (1) One (1) manual abrasive blasting cabinet, identified as AB-3, constructed in 2008, approved for modification in 2012, propelling aluminum oxide grit, maximum abrasive flow rate of 549.33 lbs/hr and a nozzle pressure of 110 psig, with a maximum capacity of 150 pounds metal parts per hour, using a portable baghouse, identified as B-3 for particulate control and exhausting inside the building.
 - (2) Two (2) enclosed abrasive blasting operation, identified as AB-1a and AB-2a, approved for construction in 2012, each with a maximum capacity of 1.5 tons of metal per hour and using 1984 pounds of cast steel grit as a medium, using cartridge filtration, identified as B-1a, for particulate control and exhausting inside the building.

(d) Laser Cutting and Welding Operation:

- (1) Twenty five (25) metal inert gas (MIG) welders, identified as W-1, constructed in 1990, each with a maximum hourly consumption of 5.94 pounds of wire, and exhausting inside.

Note: Each of the twenty five (25) metal inert gas (MIG) welders has a maximum capacity of less than six hundred twenty-five (625) pounds of wire consumed per day.

- (2) Seven (7) TIG manually operated welding stations, identified as W-2, constructed in 1990, each with a maximum hourly consumption of 1.41 lbs/hr of electrode, and exhausting inside.

Note: Each of the seven (7) TIG manually operated welding stations has a maximum capacity of less than six hundred twenty-five (625) pounds of wire consumed per day.

- (3) Two (2) Laser cutting stations, identified as LC-1 and LC-2, constructed in 1996, each with a maximum capacity of 20 inches per minute of stock 0.5 inches thick equipped with downdraft tables using cartridge filtration and exhausting through stack S2 or inside the building.
- (4) One (1) plasma cutting unit, identified as PC-1, with a maximum capacity of 35 inches per minute of stock 1.5 inches thick, equipped with downdraft exhausting through cartridge filtration and through stack S3 or inside the building.
- (5) Nine (9) Hand Held Plasma Cutters, identified as HHCT, with a maximum capacity of 6.8 inches per minute of stock 1 inch thick using no controls and exhausting inside the building.

(e) Two (2) generator testing stations, consisting of the following:

- (1) One (1) compression ignition diesel generator test cell, identified as G-1, constructed in 2007, approved for modification in 2012, rated at a maximum output of 3,351 horsepower, with a maximum heat input capacity of 8.52 MMBtu/hr, and exhausting to the outdoors. Incorporated as part of the output capability of this test cell is one (1) diesel generator set, constructed in 2007, rated at a maximum output of 402 horsepower, with a maximum heat input of 1.02 MMBtu/hr, and exhausting to the outdoors. This testing station is used to test generator sets.

[Under the NSPS for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60.4200, Subpart IIII) and NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) the 402 horsepower diesel generator (1.5 liter displacement per cylinder), identified as part of G-1, is considered an affected facility.]

- (2) One (1) compression ignition diesel generator test cell, identified as G-2, approved for construction in 2010, approved for modification in 2012, rated at a maximum output of 10,054 horsepower, with a maximum heat input capacity of 25.74 MMBtu/hr, and exhausting to the outdoors. Alternately, G-2, when testing a spark ignition lean burn natural gas engine, is rated at a maximum output of 2,681 horsepower, with a maximum heat input capacity of 6.86 MMBtu/hr, and exhausting to the outdoors. This test cell is used to test generator sets.

- (f) One (1) natural gas-fired emergency generator, identified as GBG, manufactured in 2013 and permitted in 2015, with a maximum heat input capacity of 0.086 MMBtu/hr, using no control, and exhausting outdoors.

[Under 40 CFR 60, Subpart JJJJ, this unit is an affected facility.]

[Under 40 CFR 63, Subpart ZZZZ, this unit is an affected source.]

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

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour as follows:
- (1) One (1) natural gas-fired drying oven, identified as DO-1, with a maximum heat input capacity of 2.0 MMBtu per hour, exhausting outside through stack S5.
 - (2) One (1) natural gas-fired controlled pyrolysis cleaning furnace, identified as PF-1, with a maximum heat input capacity of 0.5 MMBtu per hour and a maximum of 80 pounds of dried coatings per hour, exhausting outside through stack S4. This unit uses heat to remove paint from parts, and vaporizes VOCs in that process.
 - (3) One (1) diesel demonstrator engine, identified as G-3, approved for construction in 2011, with a maximum heat input capacity of 0.018 MMBtu per hour (7 HP), and exhausting to the outdoors.
 - (4) One (1) natural gas-fired water evaporator, identified as W-Evap, approved in 2011 for construction, with a maximum heat input capacity of 1.7 MMBtu per hour, and exhausting to the outdoors.
 - (5) One (1) natural gas-fired paint booth make-up oven with a maximum heat input capacity of 2.6 MMBtu per hour, and exhausting to the outside.
 - (6) Natural gas-fired plant wide heating units with a combined maximum heat input capacity of 11.9 MMBtu per hour, and exhausting to the outside.
 - (7) Three (3) natural gas-fired power washers with a combined maximum heat input capacity of 1.1 MMBtu per hour, and exhausting to the outside.
- (b) One (1) cold degreaser parts cleaner, identified as EU 01, constructed in 2012, using the agitation method to clean metal parts, with a maximum consumption rate of 0.02 gallons of mineral spirits per day.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F181-37056-00038, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

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

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

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

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

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

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

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

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

(C) Corrective actions taken.

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

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

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

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

- (a) All terms and conditions of permits established prior to F181-37056-00038 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
- (2) revised, or

(3) deleted.

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

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

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

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

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

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

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

Request for renewal shall be submitted to:

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

Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

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

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

and

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

C.9 Performance Testing [326 IAC 3-6]

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

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

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

- (a) The Permittee 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.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ

that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

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

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

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

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

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

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

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

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

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

- (b) The address for report submittal is:
- Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) 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.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) spray paint booth, identified as SB-1, constructed in 1997, utilizing an air assisted airless spray system (HVLV), with a maximum throughput of 0.17 metal containers per hour, and approved in 2014 for modification to add a new hand-held spray gun and associated mixing equipment for the application of spray insulation foam, with a maximum capacity of 0.25 metal skids per hour, controlled with a highloft poly filter for particulate control which exhausts to stack S1 with a maximum flow rate of 30,000 acfm
- (b) One (1) powder spray booth, identified as PCB-1, constructed in 1997, utilizing electrostatic spray gun, equipped with cartridge filtration system, exhausting inside, maximum capacity; 24 units per day, 2,000 lbs per unit and using 20.2 pounds of powder per hour, with a process throughput of 1.0 tons per hour.

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

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

D.1.1 Miscellaneous Metal and Plastic Parts Coating Operations Limitations [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9(c), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may cause, allow, or permit the discharge into the atmosphere of any VOC in excess of the following:
 - (1) Fifty-two hundredths (0.52) kilogram per liter (four and three-tenths (4.3) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies clear coatings. A clear coating is a coating that:
 - (A) lacks color or opacity; and
 - (B) is transparent and uses the undercoat as a reflectant base or undertone color.
 - (2) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating excluding water, delivered to a coating applicator in a coating application system that is air dried or forced warm air dried at temperatures up to ninety (90) degrees Celsius (one hundred ninety-four (194) degrees Fahrenheit).
 - (3) Forty-two hundredths (0.42) kilogram per liter (three and five-tenths (3.5) pounds per gallon) of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings. Extreme performance coatings are coatings designed for exposure to:
 - (A) temperatures consistently above ninety-five (95) degrees Celsius;
 - (B) detergents;
 - (C) abrasive or scouring agents;
 - (D) solvents;

- (E) corrosive atmospheres;
 - (F) outdoor weather at all times; or
 - (G) similar environmental conditions.
- (4) Thirty-six hundredths (0.36) kilogram per liter (three (3) pounds per gallon) of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.
- (b) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:
- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
 - (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
 - (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
 - (5) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.1.2 FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 not applicable, the Permittee shall comply with the following:

The VOC emissions from Spray Paint Booth SB-1 (excluding spray insulation foam) Shall not exceed 80.8 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits above and the potential to emit VOC from all other emission units at this source will ensure that the source wide emission of VOC shall be less than 100 tons per year and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), and 326 IAC 2-2 (PSD) not applicable to the source.

D.1.3 Hazardous Air Pollutants (HAPs) Minor Limits [326 IAC 2-8-4][326 IAC 2-4.1]

The amount of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs), excluding spray insulation foam, used in the spray paint booth, identified as SB-1, shall be limited as follows:

- (a) The emissions of any single HAP from SB-1 shall, each be limited to less than nine and nine-tenths (9.9) tons per twelve (12) consecutive month period with compliance determine at the end of each month;

- (b) The emission of any combination of HAPs from SB-1 shall be limited to less than 17.79 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits above and the potential to emit any single HAP and combination of HAPs from all other emission units at this source will ensure that the source wide emission of any single HAP and combination of HAPs shall be less than 10, and 25 tons per year respectively and shall render 326 IAC 2-7 (Part 70 Permits), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable to the source.

D.1.4 Particulate Emission Limitations for Work Practices and Control Technologies [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) paint booth, identified as SB-1, shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.5 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, (Particulate Emission Limitations for Manufacturing Processes) the allowable particulate emissions from the powder coat booth (PCB-1) shall not exceed 4.13 pounds per hour when operating at a process weight rate of 1.01 tons per hour.

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

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

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

Note: the process weight rate is based on the weight rate of the powder coating used plus the weight rate of the metal units being painted.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 1-6-3]

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

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

D.1.7 Volatile Organic Compounds [326 IAC 8-1-2][326 IAC 8-1-4]

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

D.1.8 Particulate Control

- (a) In order to comply with Condition D.1.4, the highloft poly filter for particulate control shall be in operation and control emissions from the paint booth SB-1 at all times that the paint booth is in operation.
- (b) In order to comply with Condition D.1.5, the cartridge filtration system shall be in operation at all times that the powder coating booth PCB-1 is in operation.

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

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth stack S1 while the paint booth SB-1 is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emission, or when evidence of overspray emissions is observed at any stack exhaust, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.10 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the cartridge filtration system used in conjunction with powder spray booth, identified as PCB-1, at least once per day when PCB-1 is in operation. When for any one reading, the pressure drop across the cartridge filtration system is outside the normal range of 2.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) 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.

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

D.1.11 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and the VOC and HAP emission limits established in Conditions D.1.1, D.1.2, and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC, individual HAP and total HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

- (3) The VOC, individual HAP and total HAP usage for each month; and
- (4) The weight of VOC, individual HAP and total HAPs emitted for each compliance period.
- (b) To document the compliance status with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) To document the compliance status with Condition D.1.10, the Permittee shall maintain records once per day of the pressure drop during normal operation. 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).
- (d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.12 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.2 and D.1.3 shall be submitted no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meet the requirement of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(c) Abrasive Blasters:

- (1) One (1) manual abrasive blasting cabinet, identified as AB-3, constructed in 2008, approved for modification in 2012, propelling aluminum oxide grit, maximum abrasive flow rate of 549.33 lbs/hr and a nozzle pressure of 110 psig, with a maximum capacity of 150 pounds metal parts per hour, using a portable baghouse, identified as B-3 for particulate control and exhausting inside the building.
- (2) Two (2) enclosed abrasive blasting operation, identified as AB-1a and AB-2a, approved for construction in 2012, each with a maximum capacity of 1.5 tons of metal per hour and using 1984 pounds of cast steel grit as a medium, using cartridge filtration, identified as B-1a, for particulate control and exhausting inside the building.

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

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

D.2.1 FESOP Limits [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 not applicable, the Permittee shall comply with the following:

- (1) The potential to emit PM_{10} from AB-1a and AB-2a, exhausting to stack S6a or inside the building, shall not exceed a total of 7.14 pounds per hour.
- (2) The potential to emit $PM_{2.5}$ from AB-1a and AB-2a, exhausting to stack S6a or inside the building, shall not exceed a total of 7.14 pounds per hour.
- (3) The potential to emit PM_{10} from AB-3, exhausting inside the building, shall not exceed 1.5 pounds per hour.
- (4) The potential to emit $PM_{2.5}$ from AB-3, exhausting inside the building, shall not exceed 1.5 pounds per hour.

Compliance with these limits, combined with the potential to emit PM_{10} and $PM_{2.5}$ emissions from all other emission units at this source, shall limit the source-wide total potential to emit of pollutants PM_{10} and $PM_{2.5}$ to less than 100 tons per year each, and shall render 326 IAC 2-7 (Part 70 Permits), not applicable.

D.2.2 Prevention of Significant Deterioration (PSD) Limits [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- (1) The potential to emit PM from AB-1a and AB-2a, exhausting to stack S6a or inside the building, shall not exceed a total of 18.8 pounds per hour.
- (2) The potential to emit PM from AB-3, exhausting inside the building, shall not exceed 2.03 pounds per hour.

Compliance with these limits, combined with the potential to emit PM emissions from all other emission units at this source, shall limit the source-wide total potential to emit of pollutants PM to less than 250 tons per year and shall render 326 IAC 2-2 (PSD), not applicable to the source.

D.2.3 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the allowable particulate from the processes listed in the table below shall be limited by the following:

Emission Unit	Process Weight Rate (Steel) (tons/hr)	Process Weight Rate (Media) (tons/hr)	Total Process Weight Rate (tons/hr)	Allowable PM Limit (lbs/hr)
AB-1a	1.5	0.99	2.49	7.56
AB-2a	1.5	0.99	2.49	7.56
AB-3	0.075	0.275	0.35	2.03

The particulate emissions limitations were calculated using the following equation:

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

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

Note: The maximum process weight rates are based on the weight rate of the metal units plus the weight rate of blast media.

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

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

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

D.2.5 Particulate Control

In order to comply with Condition D.2.2, the baghouse (B-3) and cartridge filtration system (B-1a) for particulate control shall be in operation and control emissions from the abrasive blasting operations AB-1a, AB-2a, and AB-3 at all times that the abrasive blasting operations are in operation.

D.2.6 Broken or Failed Bag/Cartridge Detection

- (a) For a single compartment baghouse, controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material being subject to abrasive blasting. 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 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 2-8-4][326 IAC 2-8-5(a)(1)]

D.2.7 Visible Emissions Notations

- (a) Visible emission notations of the stack exhaust S6a shall be performed once per day during normal daylight operations when exhausting to the atmosphere. 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 reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.8 Cartridge Filtration Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the cartridge filtration, identified as B-1a, used in conjunction with the blasting operations, identified as AB-1a and AB-2a, at least once per day when AB-1a and AB-2a are in operation. When for any one reading, the pressure drop across the cartridge filtration is outside the normal range of 0.5 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) 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.

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

D.2.9 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.7, the Permittee shall maintain records of visible emission notations of the stack exhaust S6a once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (i.e., the process did not operate that day).
- (b) To document the compliance status with Condition D.2.8, the Permittee shall maintain records once per day of the pressure drop during normal operation. 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) Section C - General Record Keeping Requirements, of this permit contains the Permittee's obligation with regard to the reports required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(e) Two (2) generator testing stations, consisting of the following:

- (1) One (1) compression ignition diesel generator test cell, identified as G-1, constructed in 2007, approved for modification in 2012, rated at a maximum output of 3,351 horsepower, with a maximum heat input capacity of 8.52 MMBtu/hr, and exhausting to the outdoors. Incorporated as part of the output capability of this test cell is one (1) diesel generator set, constructed in 2007, rated at a maximum output of 402 horsepower, with a maximum heat input of 1.02 MMBtu/hr, and exhausting to the outdoors. This testing station is used to test generator sets.

Under the NSPS for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60.4200, Subpart IIII) and NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) the 402 horsepower diesel generator (1.5 liter displacement per cylinder), identified as part of G-1, is considered an affected facility.

- (2) One (1) compression ignition diesel generator test cell, identified as G-2, approved for construction in 2010, approved for modification in 2012, rated at a maximum output of 10,054 horsepower, with a maximum heat input capacity of 25.74 MMBtu/hr, and exhausting to the outdoors. Alternately, G-2, when testing a spark ignition lean burn natural gas engine, is rated at a maximum output of 2,681 horsepower, with a maximum heat input capacity of 6.86 MMBtu/hr, and exhausting to the outdoors. This test cell is used to test generator sets.

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

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

D.3.1 FESOP Limits [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-7 (Part 70) not applicable, the Permittee shall comply with the following:

- (a) The NO_x emissions from the generator test cells, identified as G-1 and G-2, shall not exceed 75.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The CO emissions from the generator test cells, identified as G-1 and G-2, shall not exceed 84.64 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit NO_x and CO emissions from all other emission units at this source, shall limit the source-wide total potential to emit of NO_x and CO emissions to less than 100 tons per year each, and shall render 326 IAC 2-7 (Part 70 Permits), not applicable to the source.

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 1-6-3]

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

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

D.3.3 Multiple Fuel Compliance Calculation [326 IAC 2-8-4(1)]

- (a) In order to comply with the Condition D.3.1(a), the Permittee shall determine the NO_x emissions according to the following formula:

$$N = \frac{G(E_G) + O(E_O)}{2,000 \text{ lbs/ton}}$$

where:

- N = tons of nitrogen oxide emissions for twelve (12) month consecutive period
G = MMBtu/hr * hours of operation for natural gas
O = MMBtu/hr * hours of operation for diesel
E_G = 4.1 lbs NO_x per MMBtu of natural gas
E_O = 3.2 lbs NO_x per MMBtu of diesel

- (b) In order to comply with the Condition D.3.1(b), the Permittee shall determine the CO emissions according to the following formula:

$$C = \frac{G(E_G) + O(E_O)}{2,000 \text{ lbs/ton}}$$

where:

- C = tons of carbon monoxide emissions for twelve (12) month consecutive period
G = MMBtu/hr * hours of operation for natural gas
O = MMBtu/hr * hours of operation for diesel
E_G = 0.317 lbs CO per MMBtu of natural gas
E_O = 0.85 lbs CO per MMBtu/hr of diesel

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

D.3.4 Record Keeping Requirements

- (a) To document the compliance status with Conditions D.3.1 and D.3.3 the Permittee shall maintain records of the amount of NO_x and CO emitted and the hours of operations for generator test cells, identified as G-1 and G-2.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.3.5 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.3.1(a) and (b) shall be submitted using the reporting forms located at the end of this permit, or their equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (f) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour as follows:
- (1) One (1) natural gas-fired drying oven, identified as DO-1, with a maximum heat input capacity of 2.0 MMBtu per hour, exhausting outside through stack S5.
 - (2) One (1) natural gas-fired controlled pyrolysis cleaning furnace, identified as PF-1, with a maximum heat input capacity of 0.5 MMBtu per hour and a maximum of 80 pounds of dried coatings per hour, exhausting outside through stack S4. This unit uses heat to remove paint from parts, and vaporizes VOCs in that process.
 - (3) One (1) diesel demonstrator engine, identified as G-3, approved for construction in 2011, with a maximum heat input capacity of 0.018 MMBtu per hour (7 HP), and exhausting to the outdoors.
 - (4) One (1) natural gas-fired water evaporator, identified as W-Evap, approved in 2011 for construction, with a maximum heat input capacity of 1.7 MMBtu per hour, and exhausting to the outdoors.
 - (5) One (1) natural gas-fired paint booth make-up oven with a maximum heat input capacity of 2.6 MMBtu per hour, and exhausting to the outside.
 - (6) Natural gas-fired plant wide heating units with a combined maximum heat input capacity of 7.33 MMBtu per hour, and exhausting to the outside.
 - (7) Three (3) natural gas-fired power washers with a combined maximum heat input capacity of 1.1 MMBtu per hour, and exhausting to the outside.

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

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

D.4.1 Incinerators [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2, the pyrolysis cleaning furnace shall:

- (1) Consist of primary and secondary chambers or the equivalent;
- (2) Be equipped with a primary burner unless burning wood products;
- (3) Comply with 326 IAC 5-1 and 326 IAC 2;
- (4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in 326 IAC 4-2-2(c); and
- (5) Not emit particulate matter in excess of one (1) of the following:
 - (A) Three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions correct to fifty percent (50%)

excess air for incinerators with solid waste capacity of greater than or equal to two hundred (200) pounds per hour.

- (B) Five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas under standard conditions corrected to fifty percent (50%) excess air for incinerators with solid waste capacity of less than two hundred (200) pounds per hour.

- (6) If any requirements of 326 IAC 4-2-2(a)(1) through 326 IAC 4-2-2(a)(5) above are not met, the Permittee shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

D.4.2 Carbon Monoxide Emission limits [326 IAC 9-1-2]

Pursuant to 326 IAC 9-1-2 (Carbon Monoxide Emission Limits), the Permittee shall not operate the pyrolysis cleaning furnace unless the waste gas stream is burned in one of the following:

- (1) Direct-flame afterburner; or
- (2) Secondary chamber.

D.4.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities 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

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) cold degreaser parts cleaner, identified as EU 01, constructed in 2012, using the agitation method to clean metal parts, with a maximum consumption rate of 0.02 gallons of mineral spirits per day.

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

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

- (a) Pursuant to 326 IAC 8-3-2(a) (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the owner or operator of a cold cleaner degreaser shall ensure that 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 cover whenever articles are not being handled in the degreaser.
 - (4) Drain cleaned articles 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 could allow greater than twenty percent (20%) of the waste solvent by weight to evaporate.
- (b) The owner or operator of a cold cleaner degreaser subject to this subsection 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 that 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.5.2 Material Requirements Cold Cleaner Degreasers [326 IAC 8-3-8]

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

D.5.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)][326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities 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

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

D.5.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.5.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION E.1

NSPS

Emissions Unit Description:

- (e) Two (2) generator testing stations, consisting of the following:
- (1) One (1) compression ignition diesel generator test cell, identified as G-1, constructed in 2007, approved for modification in 2012, rated at a maximum output of 3,351 horsepower, with a maximum heat input capacity of 8.58 MMBtu/hr, and exhausting to the outdoors. Incorporated as part of the output capability of this test cell is one (1) diesel generator set, constructed in 2007, rated at a maximum output of 402 horsepower, with a maximum heat input of 1.02 MMBtu/hr, and exhausting to the outdoors. This testing station is used to test generator sets.
- [Under the NSPS for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60.4200, Subpart IIII) and NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) the 402 horsepower diesel generator (1.5 liter displacement per cylinder), identified as part of G-1, is considered an affected facility].
- (2) One (1) compression ignition diesel generator test cell, identified as G-2, approved for construction in 2010, approved for modification in 2012, rated at a maximum output of 10,054 horsepower, with a maximum heat input capacity of 25.74 MMBtu/hr, and exhausting to the outdoors. Alternately, G-2, when testing as a spark ignition lean burn natural gas engine, is rated at a maximum output of 2,681 horsepower, with a maximum heat input capacity of 6.86 MMBtu/hr, and exhausting to the outdoors. This test cell is used to test generator sets.

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-8-4(1)]

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

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 60, Subpart IIII.
- (b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

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

E.1.2 New Source Performance Standards (NSPS) for Stationary Compression Ignition Internal Combustion Engines [326 IAC 12][40 CFR Part 60, Subpart IIII]

The diesel generator test cell, identified as G-1, shall comply with the following provisions of 40 CFR Part 60, Subpart IIII (included as Attachment A of this permit):

- (1) 40 CFR 60.4200(a)(2)(i), (a)(4), and (c)
- (2) 40 CFR 60.4201(a)
- (3) 40 CFR 60.4204(b)
- (4) 40 CFR 60.4206
- (5) 40 CFR 60.4207(b)
- (6) 40 CFR 60.4208
- (7) 40 CFR 60.4211(a), and (c)
- (8) 40 CFR 60.4218
- (9) 40 CFR 60.4219
- (10) Table 8 to Subpart IIII

SECTION E.2

NESHAP

Emissions Unit Description:

- (e) Two (2) generator testing stations, consisting of the following:
- (1) One (1) compression ignition diesel generator test cell, identified as G-1, constructed in 2007, approved for modification in 2012, rated at a maximum output of 3,351 horsepower, with a maximum heat input capacity of 8.58 MMBtu/hr, and exhausting to the outdoors. Incorporated as part of the output capability of this test cell is one (1) diesel generator set, constructed in 2007, rated at a maximum output of 402 horsepower, with a maximum heat input of 1.02 MMBtu/hr, and exhausting to the outdoors. This testing station is used to test generator sets.
- [Under the NSPS for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60.4200, Subpart IIII) and NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) the 402 horsepower diesel generator (1.5 liter displacement per cylinder), identified as part of G-1, is considered an affected facility.]
- (2) One (1) compression ignition diesel generator test cell, identified as G-2, approved for construction in 2010, approved for modification in 2012, rated at a maximum output of 10,054 horsepower, with a maximum heat input capacity of 25.74 MMBtu/hr, and exhausting to the outdoors. Alternately, G-2, when testing as a spark ignition lean burn natural gas engine, is rated at a maximum output of 2,681 horsepower, with a maximum heat input capacity of 6.86 MMBtu/hr, and exhausting to the outdoors. This test cell is used to test generator sets.
- (f) One (1) natural gas-fired emergency generator, identified as GBG, manufactured in 2013 and permitted in 2015, with a maximum heat input capacity of 0.086 MMBtu/hr, using no control, and exhausting outdoors.
- Under 40 CFR 60, Subpart JJJJ, this unit is an affected facility.
Under 40 CFR 63, Subpart ZZZZ, this unit is an affected source.

(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 2-8-4(1)]**

E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1][40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.1 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, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart ZZZZ.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue

MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.2.2 National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [40 CFR Part 63, Subpart ZZZZ][326 IAC 20-82]

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

(a) Generator test cells G-1 and G-2:

- (1) 40 CFR 63.6580
- (2) 40 CFR 63.6585(a), (c) and (d)
- (3) 40 CFR 63.6590(a)(2)(iii) and (c)(1)
- (4) 40 CFR 63.6595(a)(6)
- (5) 40 CFR 63.6605
- (5) 40 CFR 63.6665
- (6) 40 CFR 63.6670
- (7) 40 CFR 63.6675

(b) Emergency generator GBG:

- (1) 40 CFR 63.6580
- (2) 40 CFR 63.6585(a), (c) and (d)
- (3) 40 CFR 63.6590(c)(1)
- (4) 40 CFR 63.6595(a)(7)
- (5) 40 CFR 63.6605
- (6) 40 CFR 63.6665
- (7) 40 CFR 63.6670
- (8) 40 CFR 63.6675

SECTION E.3

NSPS

Emissions Unit Description:

- (f) One (1) natural gas-fired emergency generator, identified as GBG, manufactured in 2013 and permitted in 2015, with a maximum heat input capacity of 0.086 MMBtu/hr, using no control, and exhausting outdoors.

[Under 40 CFR 60, Subpart JJJJ, this unit is an affected facility.]

[Under 40 CFR 63, Subpart ZZZZ, this unit is an affected source.]

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

New Source Performance Standards (NSPS) Requirements [326 IAC 2-8-4(1)]

E.3.1 General Provisions Relating to New Source Performance Standards [326 IAC 12-1][40 CFR Part 60, Subpart A]

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 12-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 60, Subpart JJJJ.
- (b) Pursuant to 40 CFR 60.4, the Permittee shall submit all required notifications and reports to:

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

E.3.2 New Source Performance Standards (NSPS) for Stationary Spark Ignition Internal Combustion Engines [326 IAC 12][40 CFR Part 60, Subpart JJJJ]

The emergency generator, identified as GBG, shall comply with the following provisions of 40 CFR Part 60, Subpart JJJJ (included as Attachment C of this permit):

- (1) 40 CFR 60.4230(a)(4)(iv), (a)(6), and (c)
- (2) 40 CFR 60.4233(d)
- (3) 40 CFR 60.4234
- (4) 40 CFR 60.4236
- (5) 40 CFR 60.4237(c)
- (6) 40 CFR 60.4243(d)
- (7) 40 CFR 60.4246
- (8) 40 CFR 60.4248
- (9) Table 1

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

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

Source Name: Girtz Industries, Inc.
Source Address: 5262 N. East Shafer Drive, Monticello, Indiana 47960
FESOP Permit No.: F181-37056-00038

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Girtz Industries, Inc.
Source Address: 5262 N. East Shafer Drive, Monticello, Indiana 47960
FESOP Permit No.: F181-37056-00038

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Girtz Industries, Inc.
Source Address: 5262 N. East Shafer Drive, Monticello, Indiana 47960
FESOP Permit No.: F181-37056-00038
Facility: Generator Test Cells (G-1 & G-2)
Parameter: NOx emissions
Emission Limits: shall not exceed 75.00 tons per twelve (12) consecutive month period

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Girtz Industries, Inc.
Source Address: 5262 N. East Shafer Drive, Monticello, Indiana 47960
FESOP Permit No.: F181-37056-00038
Facility: Generator Test Cells (G-1 & G-2)
Parameter: CO emissions
Emission Limits: shall not exceed 84.64 tons per twelve (12) consecutive month period

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

FESOP Quarterly Report

Source Name: Girtz Industries, Inc.
Source Address: 5262 N. East Shafer Drive, Monticello, Indiana 47960
FESOP Permit No.: F181-37056-00038
Facility: Spray Paint Booth SB-1 (excluding spray insulation foam)
Parameter: VOC emissions
Limit: less than 80.8 tons per twelve (12) consecutive month period.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

FESOP Quarterly Report

Source Name: Girtz Industries, Inc.
Source Address: 5262 N. East Shafer Drive, Monticello, Indiana 47960
FESOP Permit No.: F181-37056-00038
Facility: Spray Paint Booth SB-1
Parameter: Single HAP
Limit: The emissions of any single HAP shall be limited to less than 9.9 tons per twelve (12) consecutive month period.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

FESOP Quarterly Report

Source Name: Girtz Industries, Inc.
Source Address: 5262 N. East Shafer Drive, Monticello, Indiana 47960
FESOP Permit No.: F181-37056-00038
Facility: Spray Paint Booth SB-1
Parameter: Combined HAPs
Limit: The total HAP emissions shall be limited to less than 17.79 tons per twelve (12) consecutive month period.

QUARTER : _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

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

Source Name: Girtz Industries, Inc.
Source Address: 5262 N. East Shafer Drive, Monticello, Indiana 47960
FESOP Permit No.: F181-37056-00038

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
Federally Enforceable State Operating Permit Renewal

Source Background and Description
--

Source Name: Source Location: County: SIC Code: Permit Renewal No.: Permit Reviewer:	Girtz Industries, Inc. 5262 N. East Shafer Drive, Monticello, Indiana 47960 White 3444 (Sheet Metal Work) F181-37056-00038 Amal Agharkar
---	---

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Girtz Industries, Inc. relating to the operation of a stationary source manufacturing metal enclosures and skid bases for power packaging source, and performing diesel generator quality assurance testing. On April 7, 2016, Girtz Industries, Inc. submitted an application to the OAQ requesting to renew its operating permit. Girtz Industries, Inc. was issued a FESOP F181-30798-00038 on January 12, 2012.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) spray paint booth, identified as SB-1, constructed in 1997, utilizing an air assisted airless spray system (HVLP), with a maximum throughput of 0.17 metal containers per hour, and approved in 2014 for modification to add a new hand-held spray gun and associated mixing equipment for the application of spray insulation foam, with a maximum capacity of 0.25 metal skids per hour, controlled with a highloft poly filter for particulate control which exhausts to stack S1 with a maximum flow rate of 30,000 acfm.
- (b) One (1) powder spray booth, identified as PCB-1, constructed in 1997, utilizing electrostatic spray gun, equipped with cartridge filtration system, exhausting inside, maximum capacity; 24 units per day, 2,000 lbs per unit and using 20.2 pounds of powder per hour, with a process throughput of 1.0 tons per hour.
- (c) Abrasive Blasters:
 - (1) One (1) manual abrasive blasting cabinet, identified as AB-3, constructed in 2008, approved for modification in 2012, propelling aluminum oxide grit, maximum abrasive flow rate of 549.33 lbs/hr and a nozzle pressure of 110 psig, with a maximum capacity of 150 pounds metal parts per hour, using a portable baghouse, identified as B-3 for particulate control and exhausting inside the building.
 - (2) Two (2) enclosed abrasive blasting operation, identified as AB-1a and AB-2a, approved for construction in 2012, each with a maximum capacity of 1.5 tons of metal per hour and using 1984 pounds of cast steel grit as a medium, using cartridge filtration, identified as B-1a, for particulate control and exhausting inside the building.

(d) Laser Cutting and Welding Operation:

- (1) Twenty five (25) metal inert gas (MIG) welders, identified as W-1, constructed in 1990, each with a maximum hourly consumption of 5.94 pounds of wire, and exhausting inside.

Note: Each of the twenty five (25) metal inert gas (MIG) welders has a maximum capacity of less than six hundred twenty-five (625) pounds of wire consumed per day.

- (2) Seven (7) TIG manually operated welding stations, identified as W-2, constructed in 1990, each with a maximum hourly consumption of 1.41 lbs/hr of electrode, and exhausting inside.

Note: Each of the seven (7) TIG manually operated welding stations has a maximum capacity of less than six hundred twenty-five (625) pounds of wire consumed per day.

- (3) Two (2) Laser cutting stations, identified as LC-1 and LC-2, constructed in 1996, each with a maximum capacity of 20 inches per minute of stock 0.5 inches thick equipped with downdraft tables using cartridge filtration and exhausting through stack S2 or inside the building.
- (4) One (1) plasma cutting unit, identified as PC-1, with a maximum capacity of 35 inches per minute of stock 1.5 inches thick, equipped with downdraft exhausting through cartridge filtration and through stack S3 or inside the building.
- (5) Nine (9) Hand Held Plasma Cutters, identified as HHCT, with a maximum capacity of 6.8 inches per minute of stock 1 inch thick using no controls and exhausting inside the building.

(e) Two (2) generator testing stations, consisting of the following:

- (1) One (1) compression ignition diesel generator test cell, identified as G-1, constructed in 2007, approved for modification in 2012, rated at a maximum output of 3,351 horsepower, with a maximum heat input capacity of 8.52 MMBtu/hr, and exhausting to the outdoors. Incorporated as part of the output capability of this test cell is one (1) diesel generator set, constructed in 2007, rated at a maximum output of 402 horsepower, with a maximum heat input of 1.02 MMBtu/hr, and exhausting to the outdoors. This testing station is used to test generator sets.

[Under the NSPS for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60.4200, Subpart IIII) and NESHAP for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) the 402 horsepower diesel generator (1.5 liter displacement per cylinder), identified as part of G-1, is considered an affected facility.]

- (2) One (1) compression ignition diesel generator test cell, identified as G-2, approved for construction in 2010, approved for modification in 2012, rated at a maximum output of 10,054 horsepower, with a maximum heat input capacity of 25.74 MMBtu/hr, and exhausting to the outdoors. Alternately, G-2, when testing a spark ignition lean burn natural gas engine, is rated at a maximum output of 2,681 horsepower, with a maximum heat input capacity of 6.86 MMBtu/hr, and exhausting to the outdoors. This test cell is used to test generator sets.

- (f) One (1) natural gas-fired emergency generator, identified as GBG, manufactured in 2013 and permitted in 2015, with a maximum heat input capacity of 0.086 MMBtu/hr, using no control, and exhausting outdoors.

[Under 40 CFR 60, Subpart JJJJ, this unit is an affected facility.]

[Under 40 CFR 63, Subpart ZZZZ, this unit is an affected source.]

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour as follows:
- (1) One (1) natural gas-fired drying oven, identified as DO-1, with a maximum heat input capacity of 2.0 MMBtu per hour, exhausting outside through stack S5.
 - (2) One (1) natural gas-fired controlled pyrolysis cleaning furnace, identified as PF-1, with a maximum heat input capacity of 0.5 MMBtu per hour and a maximum of 80 pounds of dried coatings per hour, exhausting outside through stack S4. This unit uses heat to remove paint from parts, and vaporizes VOCs in that process.
 - (3) One (1) diesel demonstrator engine, identified as G-3, approved for construction in 2011, with a maximum heat input capacity of 0.018 MMBtu per hour (7 HP), and exhausting to the outdoors.
 - (4) One (1) natural gas-fired water evaporator, identified as W-Evap, approved in 2011 for construction, with a maximum heat input capacity of 1.7 MMBtu per hour, and exhausting to the outdoors.
 - (5) One (1) natural gas-fired paint booth make-up oven with a maximum heat input capacity of 2.6 MMBtu per hour, and exhausting to the outside.
 - (6) Natural gas-fired plant wide heating units with a combined maximum heat input capacity of 11.9 MMBtu per hour, and exhausting to the outside.
 - (7) Three (3) natural gas-fired power washers with a combined maximum heat input capacity of 1.1 MMBtu per hour, and exhausting to the outside.
- (b) One (1) cold degreaser parts cleaner, identified as EU 01, constructed in 2012, using the agitation method to clean metal parts, with a maximum consumption rate of 0.02 gallons of mineral spirits per day.

Existing Approvals

Since the issuance of the FESOP F181-30798-00038 on January 12, 2012, the source has constructed or has been operating under the following additional approvals:

- (a) Significant Permit Revision No. 181-31564-00038, issued on July 16, 2012;
- (b) Administrative Amendment No. 181-32998-00038 issued on April 26, 2013;
- (c) Administrative Amendment No. 181-34250-00038 issued on April 30, 2014; and
- (d) Administrative Amendment No. 181-36489-00038 issued on January 11, 2016.

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in White County.

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

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. White 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}**
White County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
White County has been classified as attainment or unclassifiable in Indiana for CO, PM₁₀ and Pb. 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.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	338.52
PM ₁₀	305.89
PM _{2.5}	305.64
SO ₂	1.27
NO _x	493.45
VOC	105.53
CO	136.41
Single HAP	30.12 (Xylene)
Total HAP	66.32

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.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of pollutants PM₁₀, PM_{2.5}, NO_x, VOC, and CO is each equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's PM₁₀, PM_{2.5}, NO_x, VOC, and CO emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-

Potential to Emit After Issuance

[illegible]

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)							
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	Total HAPs
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} . *** Limited PTE pursuant to 326 IAC 2-8 and renders 326 IAC 2-7 not applicable. G-1 and G-2 exhaust to a common stack and AB-1a and AB-2a exhaust to a common stack.								

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.

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

Federal Rule Applicability

Compliance Assurance Monitoring (CAM)

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

New Source Performance Standards (NSPS):

- (b) 40 CFR 60, Subpart E- New Source Performance Standard for Incinerators

The requirements of the New Source Performance Standard for Incinerators, 40 CFR 60, Subpart E, are not included in the permit for the one (1) pyrolysis cleaning furnace because it has a charging rate less than 50 tons per day and does not burn refuse consisting of more than 50 percent municipal type waste (household, commercial/retail, and/or institutional waste).

- (c) The requirements of the following New Source Performance Standards (NSPS) are not included in the permit because the pyrolysis cleaning furnace is not considered a municipal waste combustor or hospital/medical/infectious waste incinerator.
- (1) 40 CFR 60, Subpart Ea, Standards of Performance for Municipal Waste Combustor for which construction is commenced after December 20, 1989 and on or before September 20, 1994 (326 IAC 12).
 - (2) 40 CFR 60, Subpart Eb, Standards of Performance for Large Municipal Waste Combustors for which construction is commenced after September 20, 1994 or for which modification or reconstruction is commenced after June 19, 1996 (326 IAC 12).
 - (3) 40 CFR 60, Subpart Ec, Standards of Performance for Hospital/Medical/Infectious Waste Incinerators for Which Construction is Commenced After June 20, 1996 (326 IAC 12).
 - (4) 40 CFR 60, Subpart AAAA, Standards of Performance for Small Municipal Waste Combustion Units for Which Construction is Commenced After August 30, 1999 or for Which Modification or Reconstruction is Commenced After June 6, 2001 (326 IAC 12).
 - (5) 40 CFR 60, Subpart BBBB, Emission Guidelines and Compliance Times for Small Municipal Waste Combustion Units Constructed on or Before August 30, 1999 (326 IAC 12).

- (d) 40 CFR Part 60, Subpart CCCC - New Source Performance Standard for Commercial and Industrial Solid Waste Incineration Units

The requirements of 40 CFR Part 60, Subpart CCCC New Source Performance Standard for Commercial and Industrial Solid Waste Incineration Units for Which Construction Is Commenced After November 30, 1999 or for Which Modification or Reconstruction Is Commenced on or After June 1, 2001, are not included in the permit for the one (1) pyrolysis cleaning furnace, constructed in 2003, because pursuant to 40 CFR 60.2020(k) it is considered a parts reclamation unit.

- (e) 40 CFR 60, Subpart IIII - New Source Performance Standard for Stationary Compression Ignition Internal Combustion Engines

- (1) Diesel generator quality assurance testing station, identified as G-2, and demonstrator engine, identified as G-3 - The requirements of the New Source Performance Standard for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII (326 IAC 12), are not included in the permit for the diesel generator quality assurance testing station, identified as G-2, and for the demonstrator engine, identified as G-3, because these engines, in addition to testing other engines, also have engine components that are themselves tested, and pursuant to 40 CFR 60.4200(b), the provisions of this subpart are not applicable to stationary CI ICE being tested at a stationary CI ICE test cell/stand.

- (f) The diesel generator quality assurance testing station, identified as G-1 is subject to the New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines 40 CFR 60, Subpart IIII, because it was constructed in 2007 and has a rated power of 422 hp. The following is the list of emission unit subject to this rule:

- (A) One (1) compression ignition diesel generator test cell, identified as G-1, constructed in 2007, approved for modification in 2012, rated at a maximum

output of 3,351 horsepower, with a maximum heat input capacity of 8.52 MMBtu/hr, and exhausting to the outdoors. Incorporated as part of the output capability of this test cell is one (1) diesel generator set, constructed in 2007, rated at a maximum output of 402 horsepower, with a maximum heat input of 1.02 MMBtu/hr, and exhausting to the outdoors. This testing station is used to test generator sets.

[Under the NSPS for Stationary Compression Ignition Internal Combustion Engines (40 CFR 60.4200, Subpart IIII), this unit is considered an affected facility.]

The diesel-fired engine, identified as G-1 is subject to the following portions of 40 CFR 60, Subpart IIII:

- (1) 40 CFR 60.4200(a)(2)(i), (a)(4), and (c)
- (2) 40 CFR 60.4201(a)
- (3) 40 CFR 60.4204(b)
- (4) 40 CFR 60.4206
- (5) 40 CFR 60.4207(b)
- (6) 40 CFR 60.4208
- (7) 40 CFR 60.4211(a), and (c)
- (8) 40 CFR 60.4218
- (9) 40 CFR 60.4219
- (10) Table 8 to Subpart IIII

The requirements of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to the diesel generator quality assurance testing station, identified as G-1, except as otherwise specified in 40 CFR 60, Subpart IIII.

- (g) 40 CFR 60, Subpart JJJJ - New Source Performance Standard for Stationary Compression Ignition Internal Combustion Engines

The following generator is subject to 40 CFR 60, Subpart JJJJ - New Source Performance Standards for Stationary Spark Ignition Internal Combustion Engines because the emission unit is an emergency spark ignition internal combustion engine manufactured after January 1, 2009, with a maximum engine power greater than 19KW (25HP). The following is the list of emission unit subject to this rule:

- (A) One (1) natural gas-fired emergency generator, identified as GBG, manufactured in 2013 and permitted in 2015, with a maximum heat input capacity of 0.086 MMBtu/hr, using no control, and exhausting outdoors.

[Under 40 CFR 60, Subpart JJJJ, this unit is an affected facility.]

The natural gas-fired emergency generator, identified as GBG is subject to the following portions of 40 CFR 60, Subpart JJJJ :

- (1) 40 CFR 60.4230(a)(4)(iv), (a)(6), and (c)
- (2) 40 CFR 60.4233(d)
- (3) 40 CFR 60.4234
- (4) 40 CFR 60.4236
- (5) 40 CFR 60.4237(c)
- (6) 40 CFR 60.4243(d)
- (7) 40 CFR 60.4246
- (8) 40 CFR 60.4248

(9) Table 1

The requirements of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated as 326 IAC 12-1, apply to the one (1) natural gas-fired emergency generator, identified as GBG, except as otherwise specified in 40 CFR 60, Subpart JJJJ.

- (h) The requirements of the New Source Performance Standard for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart IIII (326 IAC 12), are not included in this renewal for 1 MW diesel generator, since the diesel-fired engine meets the definition of a nonroad engine, as defined in 40 CFR 1068.30 (excluding paragraph (2)(ii) of that definition) and is therefore not considered a stationary internal combustion engine as defined in 40 CFR 60.4219.

Pursuant to 40 CFR 60.4219, stationary internal combustion engines (ICE) differ from mobile ICE in that a stationary internal combustion engine is not a nonroad engine as defined at 40 CFR 1068.30 (excluding paragraph (2)(ii) of that definition). 40 CFR 1068.30 defines a non-road engine as any internal combustion engine that, by itself or in or on a piece of equipment, is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Indicia of transportability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform.

However, 40 CFR 1068.30 also requires that a non-road engine, as defined in the previous paragraph, not remain at a site for more than twelve (12) consecutive months. Any engine (or engines) that replace the engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in calculating the consecutive time period. Additionally, 40 CFR 1068.30 defines a location as any single site at a building, structure, facility, or installation.

- (i) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (j) 40 CFR Part 63, Subpart EEE - National Emission Standards for Hazardous Air Pollutants (NESHAPs) from Hazardous Waste Combustors

The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) from Hazardous Waste Combustors, 40 CFR Part 63, Subpart EEE (326 IAC 20-28), are not included in the permit for the pyrolysis cleaning furnace because it does not meet the definition of a hazardous waste incinerator as defined in 40 CFR 63.1201.

- (k) 40 CFR 63.3880, Subpart MMMM - National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products,

The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63.3880, Subpart MMMM (326 IAC 20-80-1) are not included in the permit since this source is not a major source of HAPs as defined in 40 CFR 63.

- (l) 40 CFR 63.9285, Subpart PPPPP - National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Engine Test Cell/Stand

The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Engine Test Cell/Stand, 40 CFR 63.9285, Subpart PPPPP (326 IAC 20-75), are not included in the permit since this source is not a major source of HAPs as defined in 40 CFR 63.

- (m) 40 CFR 63, Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants (NESHAPs) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, Subpart XXXXXX are not included in the permit because the Laser cutting and welding operations are not primarily engaged in the operations in one of the nine source categories listed in paragraphs (a)(1) through (9) of 40 CFR 63.11514. In addition, the source actually operates under SIC code 3444 (Sheet Metal Work) which is not identified in the list of Standard Industrial Classification (SIC) codes included in Table 1 of the Federal Register (FR) publication of the final rule; therefore, the requirements of NESHAP Subpart XXXXXX are not applicable to the source.

- (n) 40 CFR 63, Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Surface Coating at Area Sources

The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Surface Coating at Area Sources, 40 CFR 63.1116, Subpart HHHHHH, are not included in the permit, since the Paint Booth (SB-1) does not use chemical strippers containing methylene chloride, does not perform spray application of coatings, as defined in 40 CFR 63.11180, to motor vehicles and mobile equipment, and does not perform spray application of coatings that contain the target HAP, as defined in 40 CFR 63.11180, to a plastic and/or metal substrate on a part or product.

- (o) 40 CFR 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Reciprocating Internal Combustion Engines

(1) Diesel generator quality assurance testing station, identified as G-2 - The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Reciprocating Internal Combustion Engines 40 CFR 63, Subpart ZZZZ, are not included in the permit for the diesel generator quality assurance testing station, identified as G-2, or for the demonstrator engine, identified as G-3, because these stationary rice engines are also being tested at a stationary RICE test cell/stand, in addition to testing other engines. Pursuant to 40 CFR 63.6585 and 40 CFR 63.6590(1), stationary RICE being tested at a stationary RICE test cell/stand are excluded from the requirements of Subpart ZZZZ.

(2) The following generator is subject to 40 CFR 63, Subpart ZZZZ -National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion because it was constructed in 2007 and has a rated power of 422 hp, and is located at an area source of HAPs. Note: NESHAP ZZZZ applies to stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. The following is the list of emission units subject to this rule:

- (A) One (1) compression ignition diesel generator test cell, identified as G-1, constructed in 2007, approved for modification in 2012, rated at a maximum output of 3,351 horsepower, with a maximum heat input capacity of 8.52 MMBtu/hr, and exhausting to the outdoors. Incorporated as part of the output capability of this test cell is one (1) diesel generator set, constructed in 2007, rated at a maximum output of 402 horsepower, with a maximum heat input of 1.02 MMBtu/hr, and exhausting to the outdoors. This testing station is used to test generator sets.

[Under the NESHAP for Stationary Reciprocating Ignition Internal Combustion Engines (40 CFR 63, Subpart ZZZZ), this unit is considered an affected facility.]

The above generator is subject to the following portions of 40 CFR 63, Subpart ZZZZ:

- (1) 40 CFR 63.6580
- (2) 40 CFR 63.6585(a), (c) and (d)
- (3) 40 CFR 63.6590(a)(2)(iii) and (c)(1)
- (4) 40 CFR 63.6595(a)(6)
- (5) 40 CFR 63.6605
- (6) 40 CFR 63.6665
- (7) 40 CFR 63.6670
- (8) 40 CFR 63.6675

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to diesel generator quality assurance testing station, identified as G-1, except when otherwise specified in 40 CFR 63 Subpart ZZZZ.

- (3) Natural gas engine test cell, identified as G-2 -The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines 40 CFR 63, Subpart ZZZZ, are not included in the permit for spark ignition lean burn natural gas engine test cell, identified as G-2, because this stationary rice engine is also being tested at a stationary RICE test cell/stand, in addition to testing other engines. Pursuant to 40 CFR 63.6585 and 40 CFR 63.6590(1), stationary RICE being tested at a stationary RICE test cell/stand are excluded from the requirements of Subpart ZZZZ.
- (4) The natural gas-fired emergency generator, identified as GBG is subject to the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR 63, Subpart ZZZZ) and 326 IAC 20-82, because it is a new stationary reciprocating internal combustion engine and will be operated at an area source of HAP emissions. The following to generator is subject 40 CFR 63, Subpart ZZZZ -National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion because it is a new stationary reciprocating internal combustion engine and will be operated at an area source of HAP emissions. The following is the list of emission unit subject to this rule:
 - (A) One (1) natural gas-fired emergency generator, identified as GBG, manufactured in 2013 and permitted in 2015, with a maximum heat input capacity of 0.086 MMBtu/hr, using no control, and exhausting outdoors.

[Under 40 CFR 63, Subpart ZZZZ, this unit is an affected source.]

The above generator, is subject to the following portions of 40 CFR 63, Subpart ZZZZ:

- (1) 40 CFR 63.6580
- (2) 40 CFR 63.6585(a),(c) and (d)
- (3) 40 CFR 63.6590(c)(1)
- (4) 40 CFR 63.6595(a)(7)
- (5) 40 CFR 63.6605
- (6) 40 CFR 63.6665
- (7) 40 CFR 63.6670

(8) 40 CFR 63.6675

Pursuant to 40 CFR 63.6665, the one (1) natural gas-fired emergency generator, identified as GBG, does not have to meet the requirements of 40 CFR 63, Subpart A (General Provisions), since it is considered a new stationary RICE located at an area source of HAP emissions.

- (p) 1 MW diesel generator - The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63.6580, Subpart ZZZZ (326 IAC 20-84), are not included this renewal for 1 MW diesel generator, since the diesel-fired engine meets the definition of a nonroad engine, as defined in 40 CFR 1068.30 and is therefore not considered a stationary reciprocating internal combustion engine as defined in 40 CFR 63.6675.

Pursuant to 40 CFR 63.6675, stationary internal combustion engines (ICE) differ from mobile ICE in that a stationary internal combustion engine is not a nonroad engine as defined at 40 CFR 1068.30 (excluding paragraph (2)(ii) of that definition). 40 CFR 1068.30 defines a non-road engine as any internal combustion engine that, by itself or in or on a piece of equipment, is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Indicia of transportability include, but are not limited to, wheels, skids, carrying handles, dolly, trailer, or platform.

However, 40 CFR 1068.30 also requires that a non-road engine, as defined in the previous paragraph, not remain at a site for more than twelve (12) consecutive months. Any engine (or engines) that replace the engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in calculating the consecutive time period. Additionally, 40 CFR 1068.30 defines a location as any single site at a building, structure, facility, or installation.

- (q) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

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

The uncontrolled PM₁₀ is greater than 250 tons per year for this source. The source has accepted a PM limit that limits the emissions to less than 250 tons per year. Therefore, in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

- (a) The combined particulate matter (PM) emissions from the Abrasive blasting units AB-1a and AB-2a shall not exceed 18.8 pounds of PM per hour.
- (b) The particulate matter (PM) emissions from the Abrasive blasting unit AB-3 shall not exceed 2.03 pounds of PM per hour.

Compliance with these limits and the potential to emit PM₁₀ from other emission units at the source, shall limit the PM from the entire source to less than 250 tons per year and render the requirements of 326 IAC 2-2 (PSD) not applicable to this source.

326 IAC 2-8-4 (FESOP)

The uncontrolled PM₁₀, PM_{2.5}, NO_x, VOC, and CO emissions are each greater than 100 tons per year for this source and a single HAP is greater than ten (10) tons per year and the combination of HAPs is greater than twenty-five (25) tons per year. Therefore, in order to render the requirements of 326 IAC 2-7 (Part 70) not applicable, the Permittee shall comply with the following:

- (a) The combined particulate matter emissions less than 10 microns (PM_{10}) from the Abrasive blasting units AB-1a and AB-2a shall not exceed 7.14 pounds of PM_{10} per hour.
- (b) The combined particulate matter emissions less than 2.5 microns ($PM_{2.5}$) from the Abrasive blasting units AB-1a and AB-2a shall not exceed 7.14 pounds of $PM_{2.5}$ per hour.
- (c) The particulate matter emissions less than 10 microns (PM_{10}) from the Abrasive blasting unit AB-3 shall not exceed 1.5 pounds of PM_{10} per hour.
- (d) The particulate matter emissions less than 2.5 microns ($PM_{2.5}$) from the Abrasive blasting unit AB-3 shall not exceed 1.5 pounds of $PM_{2.5}$ per hour.

Compliance with these limits above and the potential to emit PM_{10} , and $PM_{2.5}$, from all other emission units at this source will ensure that the source wide emission of PM_{10} , and $PM_{2.5}$ shall be less than 100 tons per year each and shall render 326 IAC 2-7 (Part 70 Permits), and 326 IAC 2-2 (PSD) not applicable to the source.

The source has requested to revise the limits for NO_x , VOC, and CO for emission units G1, G2, and SB1 as follows:

Pursuant to this Operating Permit No. 181-37056-00038, the NO_x and CO emissions from the generator test cells, identified as G-1 and G-2, have been revised as follows:

- (e) The NO_x emissions from the generator test cells, identified as G-1 and G-2, shall not exceed 75.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (f) The CO emissions from the generator test cells, identified as G-1 and G-2, shall not exceed 84.64 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Pursuant to this Operating Permit No. 181-37056-00038, the VOC emissions from the Spray Paint Booth, identified as SB-1, has been revised as follows:

- (g) The VOC emissions from Spray Paint Booth SB-1 (excluding spray insulation foam) shall not exceed 80.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits above and the potential to emit NO_x , VOC, and CO from all other emission units at this source will ensure that the source wide emission of NO_x , VOC, and CO shall be less than 100 tons per year each and shall render 326 IAC 2-7 (Part 70 Permits), and 326 IAC 2-2 (PSD) not applicable to the source.

Hazardous Air Pollutants Minor (HAPs) Limits

- (h) The emissions of any single HAP from SB-1 shall, each be limited to less than nine and nine-tenths (9.9) tons per twelve (12) consecutive month period with compliance determine at the end of each month;
- (i) The emission of any combination of HAPs from SB-1 shall be limited to less than 17.79 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these limits above and the potential to emit any single HAP and combination of HAPs from all other emission units at this source will ensure that the source wide emission of any

single HAP and combination of HAPs shall be less than 10, and 25 tons per year respectively and shall render 326 IAC 2-7 (Part 70 Permits), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable to the source.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1)

326 IAC 6.5 PM Limitations Except Lake County

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6-4 (Fugitive Dust Emission Limitations)

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

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

The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

State Rule Applicability – Individual Facilities

Paint booth SB-1:

326 IAC 6-3-2(d) (Particulate Emission Limitations for Work Practices and Control Technologies)

Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) paint booth, identified as SB-1, shall be controlled by dry filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

Pursuant to 326 IAC 8-2-1 (Applicability), this rule applies to facilities constructed after July 1, 1990 located in any county, and with actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls.

This source performs miscellaneous metal coating operations as described in 326 IAC 8-2-1(a)(4) and has actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls and is therefore subject to 326 IAC 8-2-9.

The paint booth, identified as SB-1, is subject to 326 IAC 8-2-9 (Miscellaneous metal and plastic coating operations).

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The requirements of 326 IAC 8-1-6 do not apply, because 326 IAC 8-2-9 already applies to the coating process.

Powder Spray Booth PCB-1:

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

Pursuant to 326 IAC 6-3-2, the particulate emissions from the powder coat booth shall not exceed 0.81 pounds per hour when operating at a process weight rate of 0.089 tons per hour (178.3 pounds per hour).

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

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

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

Note: the process weight rate is based on the weight rate of the powder coating used plus the weight rate of the metal units being painted.

The cartridge filtration system shall be in operation at all times the powder coat booth is in operation, in order to comply with this limit.

Laser cutting and welding operations LC-1, LC-2, W-1, W-2, and HHCT:

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

- (1) The potential to emit particulate matter is less than five hundred fifty-one thousandths (0.551) pound per hour for laser cutting stations (LC-1 and LC-2) and hand held plasma cutter (HHCT). Therefore, pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 do not apply.
- (2) Pursuant to 326 IAC 6-3-1(b)(9), twenty five (25) metal inert gas (MIG) welders, identified as W-1, are each exempt from the requirements of 326 IAC 6-3, because the potential to consume welding wire is less than six hundred twenty-five (625) pounds per day each.
- (3) Pursuant to 326 IAC 6-3-1(b)(9), the seven (7) TIG welding stations, identified as W-2, are each exempt from the requirements of 326 IAC 6-3, because the potential to consume welding wire is less than six hundred twenty-five (625) pounds per day each.

Diesel generator sets (G-1 and G-2) and demonstrator engine (G-3)

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

- (1) The diesel generator sets G-1 and G-2 are exempt from the requirements of 326 IAC 6-2, since they are not sources of indirect heating.
- (2) The demonstrator engine is exempt from the requirements of 326 IAC 6-2, since it is not a source of indirect heating.

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

G-1, G-2 and G-3 are all exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight.

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

The diesel generators G-1, G-2 and G-3 are not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from the emission units is less than twenty-five (25) tons per year and ten (10) pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

G-1, G-2 and G-3 are not subject to the requirements of 326 IAC 8-1-6, since the potential VOC emissions from G-1, G-2 and G-3 are each less than twenty-five (25) tons per year.

326 IAC 9-1-1 (Carbon Monoxide Emission Limits)

G-1, G-2 and G-3 are not subject to 326 IAC 9-1-1 (Carbon Monoxide Emission Limits) because there is no applicable emission limit for the source under 326 IAC 9-1-2.

326 IAC 10-1-1 (Nitrogen Oxides Control)

G-1, G-2 and G-3 are not subject to 326 IAC 10-1-1 (Nitrogen Oxides Control) because the source is not located in Clark or Floyd counties.

326 IAC 10-5-1 (Nitrogen Oxide Reduction Program for Internal Combustion Engines (ICE))

G-1, G-2 and G-3 are not subject to 326 IAC 10-5-1 (Nitrogen Oxide Reduction Program for Internal Combustion Engines (ICE)) because none of them are large NOx SIP Call engines, as defined in 326 IAC 10-5-2(4).

Natural Gas Combustion - Pyrolysis Cleaning Furnace (PF-1), Drying oven (DO-1), and Water evaporator (W-Evap):

326 IAC 4-2-2 (Incinerators)

The natural gas fired controlled pyrolysis cleaning furnace, PF-1 is subject to the requirements of 326 IAC 4-2-1 because it meets the definition of an incinerator provided in 326 IAC 1-2-34 and is not subject to any of the rules identified in 326 IAC 4-2-1(b)(2).

326 IAC 9-1-2 (Carbon Monoxide Emission Limits)

The natural gas fired controlled pyrolysis cleaning furnace is subject to 326 IAC 9-1-2 (Carbon Monoxide Emission Limits) because this unit is a stationary source of carbon monoxide constructed after March 21, 1972 and subject to the requirements of 326 IAC 9-1-2(a)(3).

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The natural gas-fired drying oven (DO-1) and water evaporator (W-Evap) are exempt from the requirements of 326 IAC 6-2, since they are not sources of indirect heating.

326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations)

This pyrolysis cleaning furnace PF-1 is not subject to 326 IAC 7-1.1-1 (Sulfur Dioxide Emission Limitations) because the potential to emit sulfur dioxide from the pyrolysis cleaning furnace is less than twenty-five (25) tons per year and ten (10) pounds per hour.

Abrasive Blasting operations AB-1a, AB-2a and AB-3:

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the particulate from the processes listed in the table below shall be limited by the following:

Emission Unit	Process Weight Rate (Steel) (tons/hr)	Process Weight Rate (Media) (tons/hr)	Total Process Weight Rate (tons/hr)	Allowable PM Limit (lbs/hr)
AB-1a	1.5	1.98	3.48	9.45
AB-2a	1.5	1.98	3.48	9.45
AB-3	0.075	0.275	0.35	2.03

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

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

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

Note: The maximum process weight rates are based on the weight rate of the metal units plus the weight rate shot blast media.

The respective control devices, must be in operation at all times when the blasting operations, identified as AB-1a, AB-2a and AB-3, are in operation, in order to comply with these limits.

Natural gas-fired emergency generator GBG:

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

The one (1) natural gas-fired emergency generator, identified as GBG, is exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. In addition, pursuant to 326 IAC 6-3-1(b)(14), GBG is also exempt from the requirements of 326 IAC 6-3, because it has potential particulate emissions of less than five hundred fifty one thousandths (0.551) pound per hour.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1-1, the one (1) natural gas-fired emergency generator, identified as GBG, is not subject to the requirements of 326 IAC 7-1.1, since it has unlimited sulfur dioxide (SO₂) emissions less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The one (1) natural gas-fired emergency generator, identified as GBG, is not subject to the requirements of 326 IAC 8-1-6, since it has potential unlimited VOC emissions of less than twenty-five (25) tons per year.

Cold degreaser parts cleaner EU 01:

326 IAC 8-3-2 (Cold Cleaner Operations)

The degreasing operation, is subject to this rule because it is a cold cleaner degreaser constructed after January 1, 1980.

326 IAC 8-3-8 (Material requirements for cold cleaner degreasers)

Pursuant to 326 IAC 8-3-1(c)(3)(B), the cold cleaner degreaser unit is subject to the requirements of 326 IAC 8-3-8 on and after January 1, 2015.

Compliance Determination and Monitoring Requirements

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

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

arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

Emission Unit/Control	Operating Parameters	Frequency
Baghouse B-1a	Pressure Drop 0.5 to 6.0 inches	Once per day
Stack S6a	Visible Emissions Normal-Abnormal	Once per day
PCB-1	Pressure Drop 3.0 to 6.0 inches	Once per day

Emission Units	Frequency	Parameters
Paint booth (SB-1)	Daily	Inspections shall be performed to verify placement, integrity and particle loading of the dry filters.
Paint booth (SB-1)	Weekly	Observations of the overspray from the surface coating booth stacks, while one or more booths are in operation.
Paint booth (SB-1)	Monthly	Observations of the coating emission from the stacks, and presence of overspray on rooftops and nearby ground.

Proposed Changes

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

Change 1: Section A.2 has been updated to include Hand Held Plasma Cutters as follows:

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

(d) Laser Cutting and Welding Operation:

(5) Nine (9) Hand Held Plasma Cutters, identified as HHCT, with a maximum capacity of 6.8 inches per minute of stock 1 inch thick using no controls and exhausting inside the building.

Recommendation

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

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

An application for the purposes of this review was received on April 7, 2016.

Conclusion

The operation of this stationary source manufacturing metal enclosures and skid bases for power packaging source, and performing diesel generator quality assurance testing shall be subject to the conditions of the attached FESOP Renewal No. 181-37056-00038.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Amal Agharkar at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 232-8422 or toll free at 1-800-451-6027 extension 2-8422.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations
Source Summary**

Company Name: Girtz Industries, Inc.
Address City IN Zip: 5262 N. East Shafer Drive, Monticello, IN 47960
FESOP: 181-37056-00038
Reviewer: Amal Agharkar

Unlimited PTE (tons/yr)

Process	Emission Unit ID	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Single HAPs	
Spray booth	SB-1	123.6	123.6	123.6	-	-	90.3	-	59.3	30.1	Xylene
Spray booth - foam coating		-	-	-	-	-	0.66	-	0.38	0.38	MDI
Powder spray booth	PCB-1	26.67	26.67	26.67	-	-	-	-	-	-	-
Abrasive blaster	AB-1a	69.53	59.80	59.80	-	-	-	-	0.72	0.72	Manganese
Abrasive blaster	AB-2a	69.53	59.80	59.80	-	-	-	-	0.72	0.72	Manganese
Abrasive blaster	AB-3	24.06	16.84	16.84	-	-	-	-	-	-	-
MIG and TIG welders	W-1	8.11	8.11	8.11	-	-	-	-	2.80	1.74	Manganese
Thermal cutting	LC-1, LC-2, PC-1, HHCT	0.57	0.57	0.57	-	4.07	-	-	-	-	-
Natural gas combustion	-	0.16	0.63	0.63	0.05	8.27	0.46	6.95	0.16	0.15	Hexane
Pyrolysis cleaning furnace	PF-1	1.23	1.23	1.23	0.44	0.53	0.53	1.75	-	-	-
Diesel demonstrator engine	G-3	0.02	0.02	0.02	0.02	0.35	0.03	0.07	3.05E-04	9.30E-05	Formaldehyde
Diesel generator test cell	G-1	3.73	2.14	2.07	0.19	119.42	3.36	31.72	0.06	0.03	Benzene
Diesel generator test cell	G-2	11.27	6.46	6.27	0.57	360.77	10.15	95.83	2.15	1.59	Formaldehyde
Emergency generator	GBG	2.04E-04	4.17E-04	4.17E-04	1.26E-05	0.05	6.36E-04	0.08	6.91E-04	4.41E-04	Formaldehyde
Cold degreaser parts cleaner	EU-01	-	-	-	-	-	0.02	-	4.69E-05	4.69E-05	Perchloroethylene
Total		338.52	305.89	305.64	1.27	493.45	105.53	136.41	66.32	30.12	Xylene

Limited PTE (tons/yr)

Process	Emission Unit ID	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Single HAPs	
Spray booth	SB-1	6.18	6.18	6.18	-	-	80.80	-	17.79	9.90	Any
Spray booth - foam coating		-	-	-	-	-	0.66	-	0.38	0.38	MDI
Powder spray booth	PCB-1	26.67	26.67	26.67	-	-	-	-	-	-	-
Abrasive blaster	AB-1a	82.34	31.27	31.27	-	-	-	-	0.72	0.72	Manganese
Abrasive blaster	AB-2a				-	-	-	-	0.72	0.72	Manganese
Abrasive blaster	AB-3	8.89	6.57	6.57	-	-	-	-	-	-	-
MIG and TIG welders	W-1	8.11	8.11	8.11	-	-	-	-	2.80	1.74	Manganese
Thermal cutting	LC-1, LC-2, PC-1, HHCT	0.57	0.57	0.57	-	4.07	-	-	-	-	-
Natural gas combustion	-	0.16	0.63	0.63	0.05	8.27	0.46	6.95	0.16	0.15	Hexane
Pyrolysis cleaning furnace	PF-1	1.23	1.23	1.23	0.44	0.53	0.53	1.75	-	-	-
Diesel demonstrator engine	G-3	0.02	0.02	0.02	0.02	0.35	0.03	0.07	3.05E-04	9.30E-05	Formaldehyde
Diesel generator test cell	G-1	3.73	2.14	2.07	0.19	75.00	3.36	84.64	0.06	0.03	Benzene
Diesel generator test cell	G-2	11.27	6.46	6.27	0.57		10.15		2.15	1.59	Formaldehyde
Emergency generator	GBG	2.04E-04	4.17E-04	4.17E-04	1.26E-05	0.05	6.36E-04	0.08	6.91E-04	4.41E-04	Formaldehyde
Cold degreaser parts cleaner	EU-01	-	-	-	-	-	0.02	-	4.69E-05	4.69E-05	Perchloroethylene
Total		149.19	89.86	89.60	1.27	88.27	96.00	93.50	24.77	9.90	Any

**Appendix A: Emissions Calculations
Spray Booth (SB-1) - VOC and PM**

Company Name: Girtz Industries, Inc.
Address City IN Zip: 5262 N. East Shafer Drive, Monticello, IN 47960
FESOP: 181-37056-00038
Reviewer: Amal Agharkar

Material	Density (lb/gal)	Weight % Volatile (Water & Organics)	Weight % Water	Weight % VOC	Volume % Water	Volume % Solids	Usage rate (gal/unit)	Maximum throughput (unit/hr)	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	PTE of VOC (lb/hr)	PTE of VOC (ton/yr)	PTE of PM (ton/yr)	Transfer Efficiency
Primers														
Intercure 200HS	14.08	13.50%	0.00%	13.50%	0.0%	86.50%	19.00	0.17	1.90	1.90	6.14	26.89	43.08	75%
Intercure 200HS thinned	13.24	19.38%	0.00%	19.38%	0.0%	80.62%	19.00	0.17	2.57	2.57	8.29	36.30	37.75	75%
Interzinc 52	21.70	12.90%	0.00%	12.90%	0.0%	87.10%	19.00	0.17	2.80	2.80	9.04	39.60	66.85	75%
Interzinc 52-TROP	21.62	13.00%	0.00%	13.00%	0.0%	87.00%	19.00	0.17	2.81	2.81	9.08	39.76	66.53	75%
Interthane 990	9.42	35.00%	0.00%	35.00%	0.0%	65.00%	15.00	0.17	3.30	3.30	8.41	36.82	17.10	75%
Interseal 670HS	13.61	14.70%	0.00%	14.70%	0.0%	85.30%	19.00	0.17	2.00	2.00	6.46	28.30	41.06	75%
Amercoat 370	14.21	17.33%	0.02%	17.31%	0.0%	82.67%	19.00	0.17	2.46	2.46	7.94	34.80	41.55	75%
Amerlock 2	14.08	13.50%	0.0%	13.50%	0.0%	86.50%	19.00	0.17	1.90	1.90	6.14	26.89	43.08	75%
Topcoats										Worst case:	9.08	39.76	66.85	
Intercure 99	10.51	15.40%	0.00%	15.40%	0.0%	84.60%	24.00	0.17	1.62	1.62	6.60	28.92	39.72	75%
Intercure 99 thinned	10.29	19.44%	0.00%	19.44%	0.0%	80.56%	24.00	0.17	2.00	2.00	8.16	35.75	37.03	75%
Interguard 345	11.73	22.70%	0.00%	22.70%	0.0%	77.30%	24.00	0.17	2.66	2.66	10.86	47.58	40.51	75%
Interfine 878	11.85	17.30%	0.00%	17.30%	0.0%	82.70%	24.00	0.17	2.05	2.05	8.36	36.64	43.78	75%
Amershield	11.11	21.74%	0.04%	21.70%	0.1%	78.26%	24.00	0.17	2.41	2.41	9.84	43.08	38.84	75%
Filler										Worst case:	10.86	47.58	43.78	
Featherite 21330	8.45	0.00%	0.0%	0.00%	0.0%	100.00%	1.00	0.17	0.00	0.00	0.00	0.00	0.00	100%
Undercoat														
7960 Undercoat	9.30	2.87%	0.0%	2.87%	0.0%	50.00%	15.00	0.17	0.27	0.27	0.68	2.98	12.98	75%
Cleaner														
Acetone	6.58	0.00%	0.0%	0.00%	0.0%	0.00%	24.00	0.17	0.00	0.00	-	-	-	100%
Aerosols														
Gloss Black	0.26	26.71%	0.0%	26.71%	0.0%	11.43%	0.01	0.17	0.07	0.07	1.18E-04	5.17E-04	5.53E-05	75%
Sky White	0.26	20.00%	0.0%	20.00%	0.0%	18.07%	0.01	0.17	0.05	0.05	8.84E-05	3.87E-04	8.75E-05	75%
Green	0.26	23.40%	0.0%	23.40%	0.0%	14.74%	0.01	0.17	0.06	0.06	1.03E-04	4.53E-04	7.13E-05	75%
Yellow	0.26	20.41%	0.0%	20.41%	0.0%	17.68%	0.01	0.17	0.05	0.05	9.02E-05	3.95E-04	8.56E-05	75%
Power Mod White	0.26	20.06%	0.0%	20.06%	0.0%	18.08%	0.01	0.17	0.05	0.05	8.87E-05	3.88E-04	8.75E-05	75%
Silver	0.26	100.00%	0.0%	100.00%	0.0%	0.00%	0.01	0.17	0.26	0.26	4.42E-04	1.94E-03	0.00E+00	75%
Orange	0.26	100.00%	0.0%	100.00%	0.0%	0.00%	0.01	0.17	0.26	0.26	4.42E-04	1.94E-03	0.00E+00	75%

Worst case: 4.42E-04 1.94E-03 8.75E-05
Total: 20.62 90.33 123.62
PM Controlled 95%*: 6.18

Notes:

Intercure 99 is the coating product while Intercure 200HS is the primer product.

Air assisted airless spray gun is used to coat the containers.

Max. usage (gal/yr) of clean-up based on maximum paint usage and acetone only. Approximately 3 gallons/week of thinner is used (not sprayed) for various cleanup and disposed with unused paint.

Pursuant to 40 CFR 51.100(s)(1), acetone is an exempt VOC compound.

*Previous to FESOP Administrative Amendment #181-34250-00038, control efficiency was nominally 90%. The source has informed IDEM that the minimum control efficiency should be 95%.

PM=PM₁₀=PM_{2.5}

Methodology:

Weight % VOC = Weight % Volatile (Water & Organics) - Weight % Water

Volume % Water = Weight % Water * Density (lb/gal) / Density of water (8.34 lb/gal)

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

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

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

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

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

Appendix A: Emissions Calculations
Spray Booth (SB-1) - Spray insulation foam

Company Name: Girtz Industries, Inc.
Address City IN Zip: 5262 N. East Shafer Drive, Monticello, IN 47960
FESOP: 181-37056-00038
Reviewer: Amal Agharkar

VOC & HAPs (Component A)

V_{air} (ft ³ /min)	T_{sp} (K)	C_{MDI} (ppmv)	VP_{MDI}	MW (g/mol)	K_{MDI}	t_{sp}	L_{sp} (lb/yr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)
30,000	322.05	0.21	1.61E-04	250.26	0.38	8,760	750.5	2.056	0.375

VOC (Component B)

Usage rate (gal/skid)*	Maximum throughput rate (skid/hr)	Density (lb/gal)	Maximum usage (lb/hr)	Weight % DCE	% Emitted	PTE of VOC (lb/day)	PTE of VOC (ton/yr)
25	0.25	9.9	61.88	3.50%	3%	1.559	0.285

Note:

MDI emissions calculated pursuant to "MDI Emissions Reporting Guidelines for the Polyurethane Industry".

American Chemistry Council - Center for the Polyurethane Industry. May 2012. Pgs. 5-46 & 5-47.

MDI = methylene diphenyl diisocyanate (a HAP and VOC)

This process is a 2-part reaction with component A and B where the components are mixed to form a polyurethane foam.

Component A is 50:50 MDI:PMDI Blend. Component B is a polyol resin.

Components A and B are mixed 1:1. Therefore, final MDI concentration is 25% in as-applied foam.

* Usage rate (gal/skid) is 50 gal/skid as-applied. Therefore, usage rate of only Component B is 25 gal/skid

As provided by the source, the worst-case assumption is that the only emissions from component B are 3% of the Trans-1,2-Dichloroethylene (DCE) content

Weight % DCE is from the MSDS for Gaco Wall foam F183M, provided by the source.

All other organic compounds in either component react to form a solid and are retained with the foam.

This new insulation foam spray gun has been added to the source as an administrative amendment.

The PTE of this new unit is not included under the existing VOC and HAPs limits, which would require a significant permit revision

As provided by the source, the spray foam coating gun has a transfer efficiency of 100%.

This gun is similar to the unit at Royal Spa Corporation (FESOP #097-29038-00391), which has 100% transfer efficiency.

Methodology:

$$L_{sp} = (V_{air}/359) * (273.15/T_{sp}) * 60 * (C_{MDI}/1000000) * MW * K_{MDI} * t_{sp}$$

V_{air} = Exhaust airflow rate (ft³/min)

T_{sp} = Spray temperature (K)

C_{MDI} = The MDI concentration in exhaust air (ppmv) = $VP_{MDI}/760 \times 10^6$

VP_{MDI} = MDI vapor pressure at exhaust temperature

MW = Molecular weight of MDI (g/mole)

K_{MDI} = Adjustment factor to the vapor pressure (@25% MDI and 120°F)

t_{sp} = Total time spray coating is occurring (hrs/yr)

L_{sp} = Emissions from spray coating (lb/yr)

$$\text{PTE of VOC/MDI (ton/yr)} = L_{sp} * 1 \text{ ton/2000 lb}$$

$$\text{Maximum usage (lb/hr) (Component B)} = \text{Usage rate (gal/part)} * \text{Maximum throughput (unit/hr)} * \text{Density (lb/gal)}$$

$$\text{PTE of VOC (lb/hr) (Component B)} = \text{Maximum usage (lb/hr)} * (1 - \text{Transfer Efficiency})$$

$$\text{PTE of VOC (ton/yr)} = \text{PTE of VOC (lb/hr)} * 8760 \text{ hrs/yr} * 1 \text{ ton/2000 lbs}$$

**Appendix A: Emissions Calculations
Spray Booth (SB-1) - HAPs**

Company Name: Girtz Industries, Inc.
Address City IN Zip: 5262 N. East Shafer Drive, Monticello, IN 47960
FESOP: 181-37056-00038
Reviewer: Amal Agharkar

Material	Density (lb/gal)	Usage rate (gal/part)	Maximum throughput (unit/hr)	Weight % Ethyl Benzene	Weight % Xylene	Weight % Methanol	Weight % Methyl isobutyl ketone	Weight % Styrene	PTE of Ethyl Benzene (ton/yr)	PTE of Xylene (ton/yr)	PTE of Methanol (ton/yr)	PTE of Methyl isobutyl ketone (ton/yr)	PTE of Styrene (ton/yr)
Primers													
Intercure 200HS	14.08	19.00	0.17	0.92%	8.38%	-	-	-	1.83	16.69	-	-	-
Intercure 200 HS Thinned	13.24	19.00	0.17	1.06%	11.33%	-	-	-	1.99	21.22	-	-	-
Interzinc 52	21.70	19.00	0.17	0.97%	2.76%	-	-	-	2.98	8.47	-	-	-
Interzinc 52-TROP	21.62	19.00	0.17	0.88%	8.33%	-	-	-	2.69	25.48	-	-	-
Interthane 990	9.42	15.00	0.17	2.12%	15.92%	-	-	-	2.23	16.75	-	-	-
Interseal 670HS	13.61	19.00	0.17	1.54%	8.30%	-	2.67%	-	2.97	15.98	-	5.14	-
Amercoat 370	14.21	19.00	0.17	0.63%	2.53%	-	-	-	1.27	5.09	-	-	-
Amerlock 2	14.08	19.00	0.17	0.92%	8.38%	-	-	-	1.83	16.69	-	-	-
Topcoats									Worst case:	2.98	25.48	-	5.14
Intercure 99	10.51	24.00	0.17	-	0.00%	-	-	-	-	0.00	-	-	-
Intercure 99 thinned	10.29	24.00	0.17	-	0.10%	-	-	-	-	0.18	-	-	-
Interguard 345	11.73	24.00	0.17	-	0.00%	-	-	-	-	0.00	-	-	-
Interfine 878	11.85	24.00	0.17	-	2.19%	9.37%	-	-	-	4.64	19.84	-	-
Amershield	11.11	24.00	0.17	-	0.27%	-	-	-	-	0.54	-	-	-
Filler									Worst case:	-	4.64	19.84	-
Featherite 21330	8.45	1.00	0.17	-	-	-	-	20.00%	-	-	-	-	1.26
Undercoat													
7960 Undercoat	9.30	15.00	0.17	-	-	-	-	-	-	-	-	-	-
Cleaner													
Acetone	6.58	24.00	0.17	-	-	-	-	-	-	-	-	-	-
Aerosols													
Gloss Black	0.26	0.01	0.17	4.45%	24.48%	8.90%	-	-	8.62E-05	4.74E-04	1.72E-04	-	-
Sky White	0.26	0.01	0.17	3.85%	20.16%	7.25%	-	-	7.45E-05	3.90E-04	1.40E-04	-	-
Green	0.26	0.01	0.17	3.57%	19.19%	6.93%	-	-	6.91E-05	3.72E-04	1.34E-04	-	-
Yellow	0.26	0.01	0.17	3.25%	17.45%	6.31%	0.12%	-	6.29E-05	3.38E-04	1.22E-04	2.32E-06	-
Power Mod White	0.26	0.01	0.17	3.36%	17.47%	6.27%	-	-	6.50E-05	3.38E-04	1.21E-04	-	-
Silver	0.26	0.01	0.17	5.00%	10.00%	-	20.00%	-	9.68E-05	1.94E-04	-	3.87E-04	-
Orange	0.26	0.01	0.17	5.00%	10.00%	-	20.00%	-	9.68E-05	1.94E-04	-	3.87E-04	-
Worst case:									9.68E-05	4.74E-04	1.72E-04	3.87E-04	-
Individual HAP Total:									2.98	30.12	19.84	5.14	1.26
Methodology:												Total HAPs:	59.34

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

Appendix A: Emissions Calculations Powder Coating Emission Calculations

Company Name: Girtz Industries, Inc.
Address City IN Zip: 5262 N. East Shafer Drive, Monticello, IN 47960
FESOP: 181-37056-00038
Reviewer: Amal Agharkar

Material ID	Application Type	Weight % Solids	Maximum Throughput (lb/hr)*	Transfer Efficiency (%)**	Uncontrolled PTE of PM (lb/hr)	Uncontrolled PTE of PM (ton/yr)	Control Efficiency (%)***	Controlled PTE of PM (lb/hr)	Controlled PTE of PM (ton/yr)
Powder Coating	Electrostatic	100.0%	20.3	70.0%	6.09	26.67	90.0%	0.61	2.67

Notes:

Powder coated parts size varies from very small parts to larger parts. The source coats 24 units per day (1 unit per hour) (at 2,000 lbs per unit).

*Powder coat operation is a batch process and only coats 26.25 min/hr at 1 batch/hr. Maximum potential throughput is 46.4 lb/hr.

**The minimum transfer efficiency for electrostatic airless gun = 70%

***Torit ECB-1 with Ultra Web filter has MERV of 13 (90% efficiency)

PM=PM₁₀=PM_{2.5}

Methodology:

Maximum Throughput (lb/hr) = 46.4 lb/hr * 26.25 min/batch / 60 min/hr * 1 batch/hr

Uncontrolled PTE of PM (lb/hr) = Maximum Throughput (lb/hr) * Weight % Solids * (1-Transfer Efficiency)

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

Controlled PTE of PM (lb/hr) = Maximum Throughput (lb/hr) * Weight % Solids * (1-Transfer Efficiency) * (1-Control Efficiency)

PM Emissions After Control (tons/yr) = PM Emissions After Control (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

326 IAC 6-3-2 Limit

Process weight rate (ton/hr)	Allowable emissions (lb/hr)	Control efficiency needed
1.01	4.13	32.2%

Methodology:

Process weight rate (ton/hr) = (1 unit/hr * 2000 lb/hr + Maximum powder throughput (lb/hr)) / 2000 lbs/hr

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

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

Appendix A: Emissions Calculations
Abrasive blasting

Company Name: Girtz Industries, Inc.
Address City IN Zip: 5262 N. East Shafer Drive, Monticello, IN 47960
FESOP: 181-37056-00038
Reviewer: Amal Agharkar

Table 1 - Emission Factors for Abrasives

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

Table 2 - Density of Abrasives (lb/ft³)

Abrasive	Density (lb/ft ³)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate Through Nozzle (lb/hr)

Flow rate of sand through a blasting nozzle as a function of nozzle pressure and internal diameter

Nozzle Type (diameter)	ID (in)	Nozzle Pressure (psig)							
		30	40	50	60	70	80	90	100
No. 2 (1/8 inch)	0.125	28	35	42	49	55	63	70	77
No. 3 (3/16 inch)	0.1875	65	80	94	107	122	135	149	165
No. 4 (1/4 inch)	0.25	109	138	168	195	221	255	280	309
No. 5 (5/16 inch)	0.3125	205	247	292	354	377	420	462	507
No. 6 (3/8 inch)	0.375	285	355	417	477	540	600	657	720
No. 7 (7/16 inch)	0.4375	385	472	560	645	755	820	905	940
No. 8 (1/2 inch)	0.5	503	615	725	835	945	1050	1160	1265
No. 10 (5/8 inch)	0.625	820	990	1170	1336	1510	1680	1850	2030
No. 12 (3/4 inch)	0.75	1140	1420	1670	1915	2160	2400	2630	2880
No. 16 (1 inch)	1	2030	2460	2900	3340	3780	4200	4640	5060

Adjusted flow rates*

Emission Unit	Abrasive type	Density of sand (lb/ft ³) (Table 2)	ID of sandblasting nozzle (in) (Table 3)	Sand flow rate (lb/hr) (Table 3)	ID of actual nozzle (in)	Density of abrasive (lb/ft ³) (Table 2)	Nozzle pressure (psig) (Table 3)	Actual nozzle pressure (psig)	Estimated Flow rate of abrasive (lb/hr)*
AB-1a	Steel grit	99	0.4375	940	0.4375	190	100	110	1984.4
AB-2a	Steel grit	99	0.4375	940	0.4375	190	100	110	1984.4
AB-3	Al oxide	99	0.25	309	0.25	160	100	110	549.3

Uncontrolled PTE

Emission Unit	Number of nozzles	Fraction of time of wet blasting	Flow rate (lb/hr)	Emission factors		Uncontrolled PTE - PM		Uncontrolled PTE - PM ₁₀	
				PM (lb/lb abrasive)	PM ₁₀ (lb/lb PM)	lb/hr	ton/yr	lb/hr	ton/yr
AB-1a	2	0%	1984.4	0.004	0.86	15.88	69.5	13.7	59.8
AB-2a	2	0%	1984.4	0.004	0.86	15.88	69.5	13.7	59.8
AB-3	1	0%	549.3	0.010	0.70	5.5	24.1	3.8	16.8

Controlled PTE

Emission Unit	Control Efficiency	Controlled PTE - PM		Controlled PTE - PM ₁₀	
		lb/hr	ton/yr	lb/hr	ton/yr
AB-1a	90%	1.59	6.95	1.37	5.98
AB-2a	90%	1.59	6.95	1.37	5.98
AB-3	92%	0.44	1.92	0.31	1.35

HAPs

Emission Unit	Weight % Mn (of steel grit)	PTE of Mn (ton/yr)
AB-1a	1.2%	0.718
AB-2a	1.2%	0.718
AB-3	-	-

Notes:

ID = internal diameter of nozzle

Table 3 is specific to nozzle pressures from 30 to 100 psig in 10 psig increments. Therefore, Equation 3.1 was used to estimate flow rates at 110 psig.

Emission factors and Equation 3.1 from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

PM₁₀ = PM_{2.5}

* Errors in flow rate calculations have been corrected from previous Appendices A.

Methodology:Estimated flow rate of abrasive (lb/hr) = Sand flow rate (lb/hr) * (ID of sandblasting nozzle / ID of actual nozzle)² * (Density of Al oxide / Density of sand) * (Nozzle pressure/Actual nozzle pressure)

Uncontrolled PTE of PM (lb/hr) = Flow rate (lb/hr) * PM emission factor (lb/lb abrasive) * (1 - Fraction of time of wet blasting/200) * Number of nozzles

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

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

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

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

326 IAC 6-3-2 Limit

Emission Unit	Material throughput (lb/hr)	Abrasive throughput (lb/hr)	Process weight rate (ton/hr)	Allowable emissions (lb/hr)	Control efficiency needed
AB-1a	3000	1984.4	2.49	7.56	52.4%
AB-2a	3000	1984.4	2.49	7.56	52.4%
AB-3	150	549.3	0.35	2.03	63.1%

326 IAC 2-2 (PSD) Limits*

Limited PTE of PM (lb/hr)	Limited PTE of PM (ton/yr)	Control efficiency needed	Limited PTE of PM ₁₀ & PM _{2.5} (lb/hr)	Limited PTE of PM ₁₀ & PM _{2.5} (ton/yr)	Control efficiency needed
18.80	82.34	40.8%	7.14	31.27	73.9%
2.03	8.89	63.0%	1.50	6.57	61.0%

Notes:

*Abrasive blasters AB-1a and AB-2a have a common control, baghouse B-1a.

Therefore the limits for these units to avoid 326 IAC 2-2 are combined.

Methodology:

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

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

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

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

Appendix A: Emissions Calculations Welding

Company Name: Girtz Industries, Inc.
Address City IN Zip: 5262 N. East Shafer Drive, Monticello, IN 47960
FESOP: 181-37056-00038
Reviewer: Amal Agharkar

								HAPs Emissions (Weight % of fume)			Potential emissions (PTE) (ton/yr)				
Welding type	Electrode type	Wire diameter (in)	Wire feed rate (in/min)	Density (lb/in ³)	Number of stations	Total potential wire usage (lb/hr)	Weight % of electrode converted to fume	Cr	Mn	Ni	PM	Cr	Mn	Ni	Total HAPs
MIG	Steel ESAB 70/100 Ultra	0.045	220	0.283	25	148.5	1.2%	3.5%	-	-	7.81	0.27	-	-	0.27
	SS blue Max	0.045	220	0.283	25	148.5	1.2%	2.0%	22.0%	11.5%	7.81	0.16	1.72	0.90	2.77
TIG	035 Super Arc	0.09375	12	0.283	7	9.8	0.7%	-	8.8%	-	0.30	-	0.03	-	0.03
Total:											8.11	0.27	1.74	0.90	2.80

Notes:

Fume generation and percent Manganese in fume emission factors were obtained from:

"Guide for Estimating Welding Emissions for EPA and Ventilation Permit Reporting" published by the American Welding Society

MIG Weld Wire - 045 7100 Ultra Dual Shield (0.045 in diameter at 220 in/min)

Tech Data Sheet states MIG Weld Wire has an AWS Classification of E71T-1

SS blue max electrode is worst-case for manganese, nickel, and total HAPs emissions for MIG welding

TIG Weld Wire - 035 Super Arc (3/32 in (0.094 in) diameter in 12 in/min)

MSDS states TIG Weld Wire has an AWS Classification of ER70S-6

PM=PM₁₀=PM_{2.5}

Methodology:

Total wire usage (lb/hr) = $\pi * (\text{Wire diameter (in)}/2)^2 * \text{Wire feed rate (in/min)} * \text{Density (lb/in}^3\text{)} * 60 \text{ min/hr} * \text{number of stations}$

PTE of PM (ton/yr) = Total wire usage (lb/hr) * Weight % of electrode converted to fume * 8760 hrs/yr * 1 ton/2000 lbs

PTE of HAPs (ton/yr) = PTE of PM (ton/yr) * Weight % of fume

Appendix A: Emissions Calculations
Thermal Cutting

Company Name: Girtz Industries, Inc.
Address City IN Zip: 5262 N. East Shafer Drive, Monticello, IN 47960
FESOP: 181-37056-00038
Reviewer: Amal Agharkar

Emission unit	Emission unit ID	Max. # of Torches Simultaneously Cutting	Max metal thickness (in)	Max cutting rate (in)	PM Emission Factor (lb/1000 in cut, 35 mm thick)	Uncontrolled PTE of PM (lb/hr)	Uncontrolled PTE of PM (ton/yr)	Control efficiency (%)	Controlled PTE of PM (lb/hr)
Mazak Superturbo X48 Laser Cutter	LC-1	1	0.5	20	0.030	0.018	0.080	99%	0.0008
Mazak Superturbo X48 Laser Cutter	LC-2	1	0.5	20	0.030	0.018	0.080	99%	0.0008
Messer Plasma Cutter	PC-1	1	1.5	35	0.030	0.095	0.414	99%	0.0041
Hand Held Plasma Cutter	HHCT	9	1	6.8	0.040	0.147	0.643	0%	0.6433
Total:						0.131	0.573		0.649

NOx EF, liters/min	Uncontrolled PTE of NOx (lb/hr)	Uncontrolled PTE of NOx (ton/yr)
0.0	0.000	0.000
0.0	0.000	0.000
7.4	0.327	1.434
3.4	0.602	2.636
Total:	0.929	4.070

Notes:

Emission factors are from "Emission of Fume, Nitrogen Oxides, and Noise in Plasma Cutting of Stainless and Mild Steel" by Broman B. et al, The Swedish Institute of Production Engineering Research, ITW Document 1E-174-93, March 1994

Messer Plasma Cutter max thickness, rate from Vendor

PM=PM₁₀=PM_{2.5}

Methodology:

Semidry Cutting EF (lb/1,000 in cut, 35 mm thick) = 0.2 (g/min) [avg] / 0.375 (m/min) * 0.0022 (lb/g) / 39.37 (in/m) * 1,000 (in) = 0.030 (lb/1,000 in cut, 35 mm thick)

Dry Cutting EF (lb/1,000 in cut, 35 mm thick) = 2.6 (g/min) [avg] * (1-25% for Oxygen as plasma gas) / 3.6 (m/min) [avg] * 0.0022 (lb/g) / 39.37 (in/m) * 1,000 (in) = 0.03 (lb/1,000 in cut, 35 mm thick)

PTE of PM (lb/hr) = Number of Torches * Maximum Metal Thickness (in) * Maximum Cutting Rate (in/min) * 1 in/1000 in * 60min/hr * PM Emission Factor (lb/1,000 in cut, 35 mm thick)

PTE of PM (ton/yr) = PTE of PM (lb/hr) * 8,760 hours per year / 2000 lbs per ton * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only

Company Name: Girtz Industries, Inc.
Address City IN Zip: 5262 N. East Shafer Drive, Monticello, IN 47960
FESOP: 181-37056-00038
Reviewer: Amal Agharkar

Emission unit	Heat Input Capacity (MMBtu/hr)	Total Potential Throughput (MMCF/yr)
Drying Oven	2	17.2
3 Power Washers	1.1	9.4
Water Evaporator	1.68	14.4
Paint Booth Make-up	2.59	22.2
Plant Wide Heating	11.9	102.2
Totals:	19.270	165.5

	Pollutant						
	PM*	PM ₁₀ *	Direct PM _{2.5} *	SO ₂	NO _x	VOC	CO
Emission Factor (lb/MMCF)	1.9	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission (tons/yr)	0.16	0.63	0.63	0.05	8.27	0.46	6.95

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

PM_{2.5} emission factor is filterable and condensable PM_{2.5} combined.

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission (tons/yr)	1.738E-04	9.930E-05	6.206E-03	1.489E-01	2.813E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission (tons/yr)	4.137E-05	9.102E-05	1.158E-04	3.144E-05	1.738E-04
Total HAPs:	1.562E-01				

Notes:

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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:

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

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

Appendix A: Emissions Calculations
Pyrolysis Cleaning

Company Name: Girtz Industries, Inc.
Address City IN Zip: 5262 N. East Shafer Drive, Monticello, IN 47960
FESOP: 181-37056-00038
Reviewer: Amal Agharkar

Emission unit	Potential Throughput (lb/hr)	Potential Throughput (ton/yr)
Pyrolysis Cleaning Furnace (PF-1)	80	350.4

	Pollutant						
	PM*	PM ₁₀ *	Direct PM _{2.5} *	SO ₂	NO _x	VOC	CO
Emission Factor (lb/ton)	7.0	7.0	7.0	2.5	3.0	3.0	10.0
Potential Emission (tons/yr)	1.23	1.23	1.23	0.44	0.53	0.53	1.75

*There is no PM₁₀ and PM_{2.5} emission factors available, assume PM=PM₁₀=PM_{2.5}

Notes:

Pyrolysis operation is used to remove paint from parts to prepare them for further processing and vaporizes VOCs.

Emission factors from municipal solid waste combustors were used due to similarities of the process.

These emissions factors were first used for this source in MSOP 181-27457-00038, issued April 29, 2009.

MMBtu = 1,000,000 Btu

Emission Factors are from AP 42 for Refuse Combustion (5th Edition 10/96) Table 2.1-12, Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers.

The High Heat Value (HHV) corresponds to municipal solid waste (9.95 MMBtu/ton)

Methodology:

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

**Appendix A: Emissions Calculations
Demonstrator Engine (G-3)**

Company Name: Girtz Industries, Inc.
Address City IN Zip: 5262 N. East Shafer Drive, Monticello, IN 47960
FESOP: 181-37056-00038
Reviewer: Amal Agharkar

Heat input capacity (MMBtu/hr)
0.018

	Pollutant						
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO
Emission factor (lb/MMBtu)	0.31	0.31	0.31	0.29	4.41	0.36	0.95
Potential emissions (tons/yr)	0.024	0.024	0.024	0.023	0.348	0.028	0.075

*PM and PM_{2.5} emission factors are assumed to be equivalent to PM₁₀ emission factors.

No information was given regarding which method was used to determine the factor or the fraction of PM₁₀ which is condensable.

	HAPs							
	Benzene	Toluene	Xylene	1,3-Butadiene	Formaldehyde	Acetaldehyde	Acrolein	Total PAH HAPs**
Emission factor (lb/MMBtu)	9.33E-04	4.09E-04	2.85E-04	3.91E-05	1.18E-03	7.67E-04	9.25E-05	1.68E-04
Potential emissions (tons/yr)	7.36E-05	3.22E-05	2.25E-05	3.08E-06	9.30E-05	6.05E-05	7.29E-06	1.32E-05
Total HAPs (tons/yr):								0.0003

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

Notes:

Emission factors are from AP 42 (Supplement B 10/96), Tables 3.3-1 and 3.3-2

Methodology:

Potential emissions (tons/yr) = Heat input capacity (MMBtu/hr) * Emission factor (lb/MMBtu/hr) * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Diesel-fired generator test cell (G-1)

Company Name: Girtz Industries, Inc.
Address City IN Zip: 5262 N. East Shafer Drive, Monticello, IN 47960
FESOP: 181-37056-00038
Reviewer: Amal Agharkar

Heat input capacity (MMBtu/hr)	Sulfur Content (S)
8.52	0.50%

	Pollutant						
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO
Emission factor (lb/MMBtu)	0.1	0.0573	0.0556	0.005	3.20	0.09	0.85
Potential emissions (tons/yr)	3.73	2.14	2.07	0.19	119.42	3.36	31.72

PM emission factor is from AP-42 Section 3.4, Table 3.4-1. The emission factors for PM₁₀ and PM_{2.5} are from AP-42 Section 3.4, Table 3.4-2.

PM₁₀ emission factor is the sum of filterable PM₁₀ and condensable particulate. The PM_{2.5} emission factor is the sum of filterable particulate less than 3 µm and condensable particulate.

	HAPs						
	Benzene	Toluene	Xylene	Formaldehyde	Acetaldehyde	Acrolein	Total PAH HAPs**
Emission factor (lb/MMBtu)	7.76E-04	2.81E-04	1.93E-04	7.89E-05	2.52E-05	7.88E-06	2.12E-04
Potential emissions (tons/yr)	2.90E-02	1.05E-02	7.20E-03	2.94E-03	9.40E-04	2.94E-04	7.91E-03
Total HAPs (tons/yr):							0.0587

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

Notes:

Calculations include the 402 hp engine as part of G-1.

Emission factors are from AP 42 (Supplement B 10/96), Tables 3.4-1 , 3.4-2, 3.4-3, and 3.4-4.

Methodology:

Potential emissions (tons/yr) = Heat input capacity (MMBtu/hr) * Emission factor (lb/MMBtu/hr) * 500 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Diesel-fired generator test cell (G-2)

Company Name: Girtz Industries, Inc.
Address City IN Zip: 5262 N. East Shafer Drive, Monticello, IN 47960
FESOP: 181-37056-00038
Reviewer: Amal Agharkar

Diesel

Heat input capacity (MMBtu/hr)	Sulfur Content (S)
25.74	0.50%

Natural gas

Heat input capacity (MMBtu/hr)	High Heat Value (MMBtu/MMCF)	Potential Fuel Usage (MMCF/yr)
6.86	1020	0.0067

	Pollutant						
Diesel fuel	PM*	PM ₁₀ *	PM _{2.5} *	SO ₂	NO _x	VOC	CO
Emission factor (lb/MMBtu)	0.1	0.0573	0.0556	0.005	3.20	0.09	0.85
Potential emissions (tons/yr)	11.27	6.46	6.27	0.57	360.77	10.15	95.83
Natural gas							
Emission factor (lb/MMBtu)	0.00991	0.00008	0.00008	0.001	4.08	0.12	0.32
Potential emissions (tons/yr)	3.00	1.72	1.67	0.15	96.15	2.70	25.54

*For diesel fuel: PM₁₀ emission factor is the sum of filterable PM₁₀ and condensable particulate. The PM_{2.5} emission factor is the sum of filterable particulate less than 3 µm and condensable particulate.

*For natural gas: PM emission factor is filterable PM only. PM₁₀ emission factor is filterable and condensable PM₁₀ combined. PM_{2.5} emission factor is filterable and condensable PM_{2.5} combined.

	HAPs											
Diesel fuel	Acetaldehyde	Acrolein	Benzene	Biphenyl	1,3- Butadiene	Formaldehyde	Hexane	Methanol	Toluene	2,2,4- Trimethylpentane	Xylene	Total PAH HAPs**
Emission factor (lb/MMBtu)	2.52E-05	7.88E-06	7.76E-04	-	-	7.89E-05	-	-	2.81E-04	-	1.93E-04	2.12E-04
Potential emissions (tons/yr)	2.84E-03	8.88E-04	8.75E-02	-	-	8.90E-03	-	-	3.17E-02	-	2.18E-02	2.39E-02
Natural gas												
Emission factor (lb/MMBtu)	8.36E-03	5.14E-03	4.40E-04	2.12E-04	2.67E-04	5.28E-02	1.10E-03	2.50E-03	4.08E-04	2.50E-04	1.84E-04	2.69E-05
Potential emissions (tons/yr)	0.251	0.154	0.013	0.006	0.008	1.586	0.033	0.075	0.012	0.008	0.006	0.001

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

Total HAPs (Diesel fuel) (tons/yr):	0.1775
Total HAPs (Natural gas) (tons/yr):	2.1540

Notes:

This test cell can test either diesel-fired or natural gas-fired generators

The capacity of the facility to test natural gas engines is limited by the gas supply

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

HAP pollutants for natural gas combustion consist of the twelve highest HAPs included in AP-42 Table 3.2-2.

Emission factors are from AP 42 (Supplement B 10/96), Tables 3.2-2, 3.4-1, 3.4-2, 3.4-3, and 3.4-4.

Natural gas combustion is worst-case for HAPs, diesel fuel combustion is worst-case for all other pollutants.

Methodology:

SO₂ emission factor (lb/kgal) = 1.01 * S

Potential emissions (tons/yr) = Heat input capacity (MMBtu/hr) * Emission factor (lb/MMBtu/hr) * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Parts Washers**

Company Name: Girtz Industries, Inc.
Address City IN Zip: 5262 N. East Shafer Drive, Monticello, IN 47960
FESOP: 181-37056-00038
Reviewer: Amal Agharkar

Material	Density (lbs/gal)	Maximum Usage (gal/yr)	Weight % VOC	Weight % Perchloroethylene	PTE of VOC (tons/yr)	PTE of Perchloroethylene (tons/yr)
Mineral Spirits	6.42	7.30	100%	0.20%	0.02	0.000047

Methodology:

Maximum usage (gal/yr) = 0.02 gallons per day * 365 days/yr

PTE VOC/HAP (tons/yr) = Density (lbs/gal) * Maximum Usage (gal/yr) * Weight % VOC or HAP * 1 ton/2,000 lbs

TSD Appendix A: Emission Calculations
Reciprocating Internal Combustion Engines - Natural Gas
4-Stroke Rich-Burn (4SRB) Engines
Emergency Generator GBG

Company Name: Girtz Industries, Inc.
Source Address: 5262 N. East Shafer Drive, Monticello, IN 47960
FESOP: 181-37056-00038
Reviewer: Amal Agharkar

Maximum Heat Input Capacity (MMBtu/hr)	0.09
Maximum Hours Operated per Year (hr/yr)	500
Potential Fuel Usage (MMBtu/yr)	43
High Heat Value (MMBtu/MMscf)	1020
Potential Fuel Usage (MMcf/yr)	0.04

Criteria Pollutants	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
Emission Factor (lb/MMBtu)	9.50E-03	1.94E-02	1.94E-02	5.88E-04	2.21E+00	2.96E-02	3.72E+00
Potential Emissions (tons/yr)	2.04E-04	4.17E-04	4.17E-04	1.26E-05	0.05	6.36E-04	0.08

*PM emission factor is for filterable PM-10. PM10 emission factor is filterable PM10 + condensable PM.

PM2.5 emission factor is filterable PM2.5 + condensable PM.

Hazardous Air Pollutants (HAPs)

Pollutant	Emission Factor (lb/MMBtu)	Potential Emissions (tons/yr)
Acetaldehyde	2.79E-03	6.00E-05
Acrolein	2.63E-03	5.65E-05
Benzene	1.58E-03	3.40E-05
1,3-Butadiene	6.63E-04	1.43E-05
Formaldehyde	2.05E-02	4.41E-04
Methanol	3.06E-03	6.58E-05
Total PAH**	1.41E-04	3.03E-06
Toluene	5.58E-04	1.20E-05
Xylene	1.95E-04	4.19E-06
Total		6.91E-04

HAP pollutants consist of the nine highest HAPs included in AP-42 Table 3.2-3.

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

Methodology

Emission Factors are from AP-42 (Supplement F, July 2000), Table 3.2-3

Potential Fuel Usage (MMBtu/yr) = [Maximum Heat Input Capacity (MMBtu/hr)] * [Maximum Hours Operating per Year (hr/yr)]

Potential Emissions (tons/yr) = [Potential Fuel Usage (MMBtu/yr)] * [Emission Factor (lb/MMBtu)] / [2000 lb/ton]



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

September 19, 2016

Mr. Michael Keever
Girtz Industries, Inc.
SH & E Manager
5262 N. East Shafer Drive
Monticello, Indiana 47960-7313

Re: Public Notice
Girtz Industries, Inc.
Permit Level: FESOP - Renewal
Permit Number: 181-37056-00038

Dear Mr. Keever:

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

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Herald Journal in Monticello, Indiana publish the abbreviated version of the public notice no later than September 21, 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 Monticello-Union Township Public Library, 321 W. Broadway in Monticello, 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 Amal Agharkar, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 2-8422 or dial (317) 232-8422.

Sincerely,

Vicki Biddle

Vicki Biddle
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

September 19, 2016

Herald Journal
114 South Main Street
Monticello, Indiana 47960

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Girtz Industries, Inc., White 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 September 21, 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 Vicki Biddle at 800-451-6027 and ask for extension 3-6867 or dial 317-233-6867.

Sincerely,

Vicki Biddle

Vicki Biddle
Permit Branch
Office of Air Quality

Permit Level: FESOP - Renewal
Permit Number: 181-37056-00038

Enclosure

PN Newspaper.dot 2/17/2016



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

September 19, 2016

To: Monticello-Union 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: Girtz Industries, Inc.

Permit Number: 181-37056-00038

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

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

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

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

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

Enclosures
PN Library.dot 2/16/2016



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

September 19, 2016
Girtz Industries, Inc.
181-37056-00038

Dear Concerned Citizen(s):

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


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

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

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

Enclosure
PN AAA Cover.dot 2/17/2016

Mail Code 61-53

IDEM Staff	VBIDDLE 9/19/2016 Girtz Industries, Inc. 181-37056-00038 DRAFT			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling 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		Michael Keever Girtz Industries, Inc. 5262 N East Shafer Dr Monticello IN 47960 (Source CAATS)									
2		David Girtz President and CEO Girtz Industries, Inc. 5262 N East Shafer Dr Monticello IN 47960-7313 (RO CAATS)									
3		Mr. Harry D. DuVall P.O. Box 147 Idaville IN 47950 (Affected Party)									
4		Monticello City Council and Mayors Office 227 N. Main Street Monticello IN 47960 (Local Official)									
5		White County Commissioners P.O. Box 260 Monticello IN 47960-0260 (Local Official)									
6		Monticello Union Township Public Library 321 Broadway St Monticello IN 47690 (Library)									
7		Ms. Magie Read P.O. Box 248 Battle Ground IN 47920 (Affected Party)									
8		White County Health Department 315 N Illinois St Monticello IN 47960 (Health Department)									
9											
10											
11											
12											
13											
14											
15											

Total number of pieces Listed by Sender 8	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.
---	--	--	--