

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 a Significant Revision to a Federally Enforceable State Operating Permit (FESOP)

for Globe Industrial, LLC./Globe Industries, LLC. in Washington County

Significant Permit Revision No.: F175-37411-00030

The Indiana Department of Environmental Management (IDEM) has received an application from Globe Industrial, LLC./Globe Industries, LLC., located at 335 S. Voyles Road, Pekin, IN, 47165, for a significant revision of its FESOP issued on July 21, 2015. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Globe Industrial, LLC./Globe Industries, LLC. to make certain changes at its existing source. Globe Industrial, LLC./Globe Industries, LLC. has applied to add new emissions unit to the source.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). The potential to emit regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

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

Borden Public Library 117 W Main St Borden, IN 47106

and

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

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

### How can you participate in this process?

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

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing,



IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR F175-37411-00030 in all correspondence.

### Comments should be sent to:

Ms. Renee Traivaranon IDEM, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251 (800) 451-6027, ask for extension 4-5615 Or dial directly: (317) 234-5615 Fax: (317) 232-6749 attn: Renee Traivaranon E-mail: Rtraivar@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: <u>http://www.in.gov/idem/5881.htm</u>; and the Citizens' Guide to IDEM on the Internet at: <u>http://www.in.gov/idem/6900.htm</u>.

### What will happen after IDEM makes a decision?

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

If you have any questions, please contact Ms. Renee Traivaranon of my staff at the above address.

Iryn Calilung Section Chief

Permits Branch Office of Air Quality



# Indiana Department of Environmental Management

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Michael R. Pence Governor

DRAFT

Carol S. Comer Commissioner

Mr. Houston Andres Globe Industrial, LLC./Globe Industries, LLC. 335 S. Voyles Road Pekin, IN, 47165

> Re: F175-37411-00030 Significant Permit Revision to F175-35432-00030

Dear Mr. Andres:

Globe Industrial, LLC./Globe Industries, LLC. was issued a Federally Enforceable State Operating Permit (FESOP) No. F175-35432-00030 on July 21, 2015 for a stationary metal fabrication plant (primary purchased pipe and pipe fittings) located at 335 S. Voyles Road, Pekin, IN, 47165. On July 19, 2016, the Office of Air Quality (OAQ) received an application from the source requesting to add shot blasting machine to the permit. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit.

Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. <u>General Construction Conditions</u>

The data and information supplied with the application shall be considered part of this source modification approval. Prior to <u>any</u> proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

- 2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- 3. <u>Effective Date of the Permit</u> Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
- 4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
- 5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.



Globe Industrial, LLC./Globe Industries, LLC. Pekin, Indiana Permit Reviewer: Renee Traivaranon

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit.

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All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised.

A copy of the permit is available on the Internet at: <u>http://www.in.gov/ai/appfiles/idem-caats/</u>. 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: <u>http://www.in.gov/idem/5881.htm</u>; and the Citizens' Guide to IDEM on the Internet at: <u>http://www.in.gov/idem/6900.htm</u>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Ms. Renee Traivaranon of my staff at 317-234-5615 or 1-800-451-6027, and ask for extension 4-5615.

Sincerely,

Iryn Calilung, Section Chief Permits Branch Office of Air Quality

Attachments: Technical Support Document and revised permit

IC/rt

cc: File - Washington County Washington County Health Department U.S. EPA, Region V Compliance and Enforcement Branch Indiana Department of Environmental Management

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Michael R. Pence Governor



Carol S. Comer Commissioner

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

# Globe Industrial, LLC./Globe Industries, LLC 335 S. Voyles Road Pekin, Indiana 47165

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

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

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

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

 Operation Permit No. F175-35432-00030

 Issued by: Original signed by:

 Nathan C. Bell, Section Chief

 Permits Branch

 Office of Air Quality

 Expiration Date:

 July 21, 2020

Significant Permit Revision No.: F175-37411-00030	
Issued by:	Issuance Date:
Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Expiration Date: July 21, 2020







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Pekin, Indiana Permit Reviewer: Dominic Williams



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### **Compliance Determination Requirements**

D.2.4 Particulate Control

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Affidavit of Construction	

### 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.

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

The Permittee owns and operates a stationary metal fabrication plant (primary purchased pipe and pipe fittings).

Source Address:	335 S. Voyles Road, Pekin, Indiana 47165
General Source Phone Number:	(812) 301-2600
SIC Code:	3498
County Location:	Washington
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

- Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)] A.2 This stationary source consists of the following emission units and pollution control devices:
  - (a) One (1) paint booth, identified as EU003, constructed in 2014, with a maximum throughput of 103.125 square feet of metal piping per hour, using HPLV spray guns, using fabric filters for control, and exhausting to vents V001-V003.
  - (b) One (1) shot blast booth, identified as EU001, constructed in 2014, with a maximum throughput of 6,222 pounds of steel shot per hour, using baghouse C-01 as control, and exhausting indoors.
  - One (1) shot blast booth, identified as EU002, constructed in 2015, with a maximum (c) throughput of 6.222 pounds of steel shot per hour, 2.044 pounds of aluminum oxide per hour, or 1,277 pounds of black beauty per hour, using baghouse C-02 as control, and exhausting indoors.
  - One (1) shot blast machine, identified as EU005, approved in 2016 for construction, with (d) a maximum blasting rate of 144,000 pounds of steel shot per hour, using cartridges and baghouse C-03 for particulate control, and exhausting outdoors.
  - (e) One (1) welding and plasma cutting operation, identified as EU004, constructed in 2015, consisting of ten (10) metal inert gas welding stations, two (2) submerged arc welding stations, three (3) semi-automatic plasma cutting stations, and two (2) manual plasma torch cutting stations, using no controls and exhausting to vent V-004.
  - One (1) liquefied petroleum gas-fired boiler, identified as LPG Boiler, constructed in 2014, (f) with a maximum heat input capacity of 3.00 MMBtu per hour.
  - (g) Two (2) liquefied petroleum gas-fired space heaters, identified as LPG Space Heaters, constructed in 2014, with a maximum heat input capacity of 0.12 MMBtu per hour, respectively.

# A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)] This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

### 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) for a Federally Enforceable State Operating Permit (FESOP).

### SECTION B

### **GENERAL CONDITIONS**

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

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

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

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

#### B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4][326 IAC 2-8]

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

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

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

- This permit, F175-35432-00030, is issued for a fixed term of five (5) years from the (a) 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.
- Term of Conditions [326 IAC 2-1.1-9.5] B.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.

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

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

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

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

2 A F

- B.8 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
   This permit does not convey any property rights of any sort or any exclusive privilege.
- B.9 Duty to Provide Information [326 IAC 2-8-4(5)(E)]
  - (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
  - (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The

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

- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.
- B.14 Emergency Provisions [326 IAC 2-8-12]
  - (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
  - (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
    - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
    - (2) The permitted facility was at the time being properly operated;
    - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
    - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Southeast Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

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

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

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



(C) Corrective actions taken.

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

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

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

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

- All terms and conditions of permits established prior to F175-35432-00030 and issued (a) pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - deleted. (3)

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

### B.16 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]
  - (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit.
     [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
    - (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
      - (1) That this permit contains a material mistake.
      - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
      - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
    - (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
    - (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit: and

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

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

- Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 (a) 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)]

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

- The Permittee may make any change or changes at the source that are described in (a) 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);
  - The Permittee notifies the: (4)

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).
- Alternative Operating Scenarios [326 IAC 2-8-15(c)] (c) The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.
- B.21 Source Modification Requirement [326 IAC 2-8-11.1] A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.
- 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.22 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:
  - Enter upon the Permittee's premises where a FESOP source is located, or emissions (a) related activity is conducted, or where records must be kept under the conditions of this permit;
  - As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have (b) 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;
  - As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample (d) or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and



- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
- B.23 Transfer of Ownership or Operational Control [326 IAC 2-8-10]
  - (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
  - (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

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

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

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

### SECTION C

## SOURCE OPERATION CONDITIONS

**Entire Source** 

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

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

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

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

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

- Pursuant to 326 IAC 2-8: (a)
  - (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
  - The potential to emit any combination of HAPs from the entire source shall be (3) limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire (b) 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.
- Section D of this permit contains independently enforceable provisions to satisfy (d) 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:

- Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute (a) 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.

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- C.6 Fugitive Dust Emissions [326 IAC 6-4] The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
  - (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
  - (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
    - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
    - (2) If there is a change in the following:
      - (A) Asbestos removal or demolition start date;
      - (B) Removal or demolition contractor; or
      - (C) Waste disposal site.
  - (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
  - (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Compliance and Enforcement Branch, Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251 The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

- C.8 Performance Testing [326 IAC 3-6]
  - (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

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

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

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

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

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



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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:

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

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

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

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

- Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)] C.11
  - When required by any condition of this permit, an analog instrument used to measure a (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)]

- Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3] C.12 Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):
  - The Permittee shall prepare written emergency reduction plans (ERPs) consistent with (a) safe operating procedures.
    - (b) These ERPs shall be submitted for approval to:

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

no later than 180 days from the date on which this source commences operation.

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

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

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

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

#### C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5] Upon detecting an excursion where a response step is required by the D Section or an

exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- The response shall include minimizing the period of any startup, shutdown or (b) 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.
- A determination of whether the Permittee has used acceptable procedures in response to (c) an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.



- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]
  - (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.
    - (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
    - (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

- C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
  - (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
    - (AA) All calibration and maintenance records.
    - (BB) All original strip chart recordings for continuous monitoring instrumentation.
    - (CC) Copies of all reports required by the FESOP.
    - Records of required monitoring information include the following, where applicable:
      - (AA) The date, place, as defined in this permit, and time of sampling or measurements.
      - (BB) The dates analyses were performed.
      - (CC) The company or entity that performed the analyses.
      - (DD) The analytical techniques or methods used.
      - (EE) The results of such analyses.
      - (FF) The operating conditions as existing at the time of sampling or measurement.

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

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

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

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be



included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

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

### Stratospheric Ozone Protection

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

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



#### **SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS**

### **Emissions Unit Description:**

One (1) paint booth, identified as EU003, constructed in 2014, with a maximum throughput of (a) 103.125 square feet of metal piping per hour, using HPLV spray guns, using fabric filters for control, and exhausting to vents V001-V003.

(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)]

Particulate Matter [326 IAC 6-3-2] D.1.1

> Pursuant to 326 IAC 6-3-2(d), particulate matter emissions from Paint Booth EU003 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device and the Permittee shall operate the control device in accordance with manufacturer's specifications.

- Volatile Organic Compounds [326 IAC 8-2-9] [326 IAC 8-1-2] D.1.2
  - Pursuant to 326 IAC 8-2-9(c), the owner or operator of the Paint Booth EU003 shall not (a) allow discharge into the atmosphere of VOC in excess of the following emission limitations as delivered to the applicator:

Type of Coating	Emission Limitation (Ib of VOC per gallon of coating, excluding water)
Clear coatings	4.3
Air dried or forced warm air dried at temperatures up to 90 degrees Celsius	3.5
Extreme performance coatings	3.5
All other coatings and coating application systems	3.0

(b) Pursuant to 326 IAC 8-2-9 and 326 IAC 8-1-2(b), when coatings are used in Paint Booth EU003 that do not comply with limitations under 326 IAC 8-2-9, the Paint Booth EU003 VOC emissions shall not exceed the following equivalent emission limitations:

Type of Coating	Equivalent Emission Limitation (Ib of VOC per gallon of solids)
Clear coatings	10.342
Air dried or forced warm air dried at temperatures up to 90 degrees Celsius	6.674
Extreme performance coatings	6.674
All other coatings and coating application systems	5.064

These equivalent emission limitations were determined using the following equation:

$$E = L / (1 - (L/D))$$

Where:

- L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
- D= Density of VOC in coating in pounds per gallon of VOC;
- E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.



A solvent density of 7.36 pounds of VOC per gallon of coating shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit contained in 326 IAC 8.

- (c) 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.1.3 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8] [326 IAC 2-4.1]

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), and render the requirements of 326 IAC 2-7 (Part 70 Permits), and 326 IAC 2-4.1 (Major Source of Hazardous Air Pollutants (HAP)) not applicable the Permittee shall comply with the following:

- (a) The total input of any single HAP to Paint Booth EU003, including coatings, dilution solvents, and cleaning solvents, shall not exceed 9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The total input of combined HAPs to Paint Booth EU003, including coatings, dilution solvents, and cleaning solvents, shall not exceed 22 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 HAP from all other emission units at the source, shall limit HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period for each single HAP and less than 25 tons per twelve (12) consecutive month period for total combined HAPs and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable.

### D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for Paint Booth EU003 and its associated control device. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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### **Compliance Determination Requirements**

#### D.1.5 Particulate Control

In order to comply with Condition D.1.1, the dry filters for PM, PM10 and PM2.5 control shall be in operation and control emissions from Paint Booth EU003 at all times that the paint booth is in operation.

- D.1.6 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]
  - Compliance with the VOC content limit in Condition D.1.2 shall be determined pursuant to (a) 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.
  - Pursuant to 326 IAC 8-1-2(b), when coatings are used in Paint Booth EU003 that do not (b) comply with limitations under 326 IAC 8-2-9, the Permittee shall determine compliance with Condition D.1.2(b) using the following equation:

$$E_a = \frac{L_a}{1 - \frac{L_a}{D_a}}$$

Where:

 $E_a$  = Actual emissions in pounds of VOC per gallon of coating solids, as applied.  $L_a$  = Actual VOC content in pounds of VOC per gallon of coating, as applied.  $D_a$  = Actual density of the VOC in the coating, as applied, in pounds per gallon of VOC.

#### D.1.7 Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the HAP usage limits contained in Conditions 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.

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

#### D.1.8 Monitoring

- Daily inspections shall be performed to verify the placement, integrity and particle loading (a) of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from Paint Booth EU003 stack while the paint booth is in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the paint booth vents V001-V003 and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

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

- D.1.9 **Record Keeping Requirements** 
  - To document the compliance status with Condition D.1.8, the Permittee shall maintain a (a) log of weekly overspray observations and daily and monthly inspections.
  - (b) To document the compliance status with Condition D.1.2, D.1.3, and D.1.6, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.2 and the HAP input limits established in Condition D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
    - (1) The VOC and HAP content of each coating material and solvent used.
    - (2) The amount of coating material and solvent less water used on monthly basis.
      - (A) Records shall include purchase orders, invoices, calculations, 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 cleanup solvent usage for each month;
    - (4) The total single HAP input and total combined HAP input for each month; and
    - (5) The total single HAP and total combined HAP emitted for each compliance period.
    - (6) When using non-compliant coatings, the Permittee shall maintain records of the actual VOC content of the coatings, the actual density of the VOC in the coating, the actual measured transfer efficiency, and the actual VOC emissions using one of the equations contained in Condition D.1.8.
  - (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

### D.1.10 Reporting Requirements

Quarterly summaries of the information to document the compliance status with Condition D.1.3 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 Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee 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).

#### **EMISSIONS UNIT OPERATION CONDITIONS SECTION D.2**

### **Emissions Unit Description:**

- One (1) shot blast booth, identified as EU001, constructed in 2014, with a maximum (b) throughput of 6,222 pounds of steel shot per hour, using baghouse C-01 as control, and exhausting indoors.
- One (1) shot blast booth, identified as EU002, constructed in 2015, with a maximum (c) throughput of 6,222 pounds of steel shot per hour, 2,044 pounds of aluminum oxide per hour, or 1,277 pounds of black beauty per hour, using baghouse C-02 as control, and exhausting indoors.
- (d) One (1) shot blast machine, identified as EU005, approved in 2016 for construction, with a maximum blasting rate of 144,000 pounds of steel shot per hour, using cartridges and baghouse C-03 for particulate control, and exhausting outdoors.
- One (1) welding and plasma cutting operation, identified as EU004, constructed in 2015, (e) consisting of ten (10) metal inert gas welding stations, two (2) submerged arc welding stations, three (3) semi-automatic plasma cutting stations, and two (2) manual plasma torch cutting stations, using no controls and exhausting to vent V-004.

(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 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM emissions from the following units shall not exceed the limits specified in the table below:

Emission Unit	Control Device	PM Limit (lb/hr)
Shot Blast Booth EU001	Baghouse C-01	6.22
Shot Blast Booth EU002	Baghouse C-02	6.22
Shot Blast Machine EU005	Cartridges and Baghouse C-03	11.23

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit PM emissions from the entire source to less than 250 tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### FESOP and PSD Minor Limits [326 IAC 2-8] [326 IAC 2-2] D.2.2

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), and render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM10, and PM2.5 emissions after control from the following units shall not exceed the limits specified in the table below:

Emission Unit	Control Device	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Shot Blast Booth EU001	Baghouse C-01	5.35	5.35
Shot Blast Booth EU002	Baghouse C-02	5.35	5.35
Shot Blast Machine EU005	Cartridges and Baghouse C-03	9.66	9.66

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit PM10 and PM2.5 emissions from the entire source to less than 100 tons per 12 consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable.

### D.2.3 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the following operations shall be limited as shown in the table below:

Emission Unit	Process Weight Rate (ton/hr)	Allowable PM Emission Rate (lb/hr)
Shot Blast Booth EU001	3.911	10.22
Shot Blast Booth EU002	3.911	10.22
Shot Blast Machine EU005	72.00	48.04
Welding EU004	0.033	0.551
Plasma Cutting EU004	0.05	0.551

The pounds per hour limitations were calculated with the following equation:

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

 $E = 4.10 * P^{0.67}$ 

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

or

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

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

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

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

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

### **Compliance Determination Requirements**

### D.2.5 Testing Requirements [326 IAC 2-7-6(1), (6)]

(a) In order to demonstrate the compliance status with Conditions D.2.1, D.2.2 and D.2.3, the Permittee shall conduct PM, PM<sub>10</sub> and PM<sub>2.5</sub> testing for shot blast machine EU005, no later than 180 days after the initial start-up of the shot blast machine, utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

 $PM_{10}$  and  $PM_{2.5}$  includes filterable and condensable PM.

(b) Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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#### D.2.6 Particulate Control

- In order to comply with Conditions D.2.1, D.2.2 and D.2.3, the baghouses for particulate (a) control for PM, PM10 and PM2.5 control shall be in operation and control emissions from the shot blast booths (EU001, EU002 and EU005) at all times that the shot blast booths/machine are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.7 Parametric Monitoring

> The Permittee shall record the pressure drop across the baghouses, at least once per day when the shot blast booths/machine are in operation. When for any one reading, the pressure drop across the baghouses are outside the normal range, the Permittee shall take reasonable response steps. The normal range for the baghouses associated with:

- (a) shot blast booths EU001 and EU002 is a pressure drop between 2.5 and 4.5 inches of water:
- shot blast machine EU005 is a pressure drop between 2.5 and 5.0 inches of water, (b) unless a different upper-bound or lower-bound value for this range is determined during the latest stack test.

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.

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, or other time period specified by the manufacturer. The Permittee shall maintain records of the manufacturer specifications, if used.

#### Broken or Failed Bag Detection D.2.8

- For a single compartment baghouse controlling emissions from a process operated (a) 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 gualifies 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 in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

### $R\Delta F$ Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

#### **Record Keeping Requirements** D.2.9

- To document the compliance status with Condition D.2.7, the Permittee shall maintain (a) daily records of the pressure drop across each of the baghouses associated with the shot blast booths and shot blast machine. 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); and
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.



#### **EMISSIONS UNIT OPERATION CONDITIONS** SECTION D.3

### **Emissions Unit Description:**

One (1) liquefied petroleum gas-fired boiler, identified as LPG Boiler, constructed in 2014, with (e) a maximum heat input capacity of 3.00 MMBtu 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)]

Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4] D.3.1

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate emissions from the liquefied petroleum gas-fired boiler, identified as LPG Boiler, shall not exceed 0.6 lb/MMBtu.

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name:	Globe Idustrial, LLC./Globe Industries, LLC
Source Address:	335 S. Voyles Road, Pekin, Indiana 47165
FESOP Permit No.:	F175-35432-00030

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.
Please check what document is being certified:
Annual Compliance Certification Letter
Test Result (specify)
Report (specify)
Notification (specify)
Affidavit (specify)
Other (specify)

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

Title/Position:

Date:



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

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

Source Name:	Globe Idustrial, LLC./Globe Industries, LLC
Source Address:	335 S. Voyles Road, Pekin, Indiana 47165
FESOP Permit No.:	F175-35432-00030

#### This form consists of 2 pages

Page 1 of 2

□ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business • hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12

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:

DRAFT 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? Υ Ν Describe: Type of Pollutants Emitted: TSP, PM-10, SO<sub>2</sub>, VOC, NO<sub>X</sub>, CO, Pb, other: Estimated amount of pollutant(s) emitted during emergency: Describe the steps taken to mitigate the problem: Describe the corrective actions/response steps taken: Describe the measures taken to minimize emissions: If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:

Title / Position:

Date: 

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



#### Indiana Department of Environmental Management Office of Air Quality **Compliance and Enforcement Branch**

#### **FESOP Quarterly Report**

Source Name:	Globe Industrial, LLC./Globe Industries, LLC
Source Address:	335 S. Voyles Road, Pekin, Indiana 47165
MSOP Permit No.:	F175-35432-00030
Source:	Paint Booth EU003
Pollutant:	Single HAP
Limit:	The total input of any single HAP to Paint Booth EU003, including coatings, dilution solvents, and cleaning solvents, shall not exceed 9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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:

#### )RAFT Indiana Department of Environmental Management **Office of Air Quality Compliance and Enforcement Branch**

## **FESOP Quarterly Report**

Source Name: Globe Industrial, LLC./Globe Industries, LLC 335 S. Voyles Road, Pekin, Indiana 47165 Source Address: MSOP Permit No.: F175-35432-00030 Source: Paint Booth EU003 Pollutant: **Total HAPs** Limit: The total input of combined HAPs to Paint Booth EU003, including coatings, dilution solvents, and cleaning solvents, shall not exceed 22 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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	۶r.
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Deviation/s occurred in this quarter.
Deviation has been reported on:

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

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

Signature:

Date:

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

 $R\Delta F$ 

#### 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:	Globe Idustrial, LLC./Globe Industries, LLC
Source Address:	335 S. Voyles Road, Pekin, Indiana 47165
FESOP Permit No.:	F175-35432-00030

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:

**Duration of Deviation:** 

Number of Deviations:

**Probable Cause of Deviation:** 

Response Steps Taken:

**Permit Requirement** (specify permit condition #)

Date of Deviation:

Number of Deviations:

**Probable Cause of Deviation:** 

**Response Steps Taken:** 

## DRAFT

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: \_\_\_\_\_

(typed or printed)

Mail to: Permit Administration and Support Section

.

Office of Air Quality 100 North Senate Avenue MC 61-53 IGCN 1003 Indianapolis, Indiana 46204-2251

Globe Industrial, LLC./Globe Industries, LLC 335 S. Voyles Road Pekin, Indiana 47165

Affidavit of Construction

I,		, being di	uly sworn upon my oath, depose and say:
(Name	e of the Authorized Representative)	ů	
1.	I live in sound mind and over twenty-one (21) years of	age, I am competent t	County, Indiana and being of o give this affidavit.
2.	I hold the position of	for	
	I hold the position of(Title)		(Company Name)
3.	By virtue of my position with		, I have personal
	knowledge of the representations contained in these representations on behalf of	this alloavit and am a	uthorized to make
		(Compa	any Name)
4.	I hereby certify that Globe Idustrial, LLC./Globe has constructed and will operate a metal fabric onin permit application received by the Office of Air Source Construction Permit and Federally Enfo No. 175-00030 issued on	ation plant (primary pu conformity with the re Quality on February 4 prceable State Operati	urchased pipe and pipe fittings) quirements and intent of the construction , 2015 and as permitted pursuant to New
5.	Permittee, please cross out the following st were constructed/substituted as described in th accordance with the construction permit.		
Further Affiant s	said not.		
I affirm under pe and belief.	enalties of perjury that the representations conta		
	Signa Date	ture	
STATE OF IND	IANA) )SS		
COUNTY OF	)		
Subsc	ribed and sworn to me, a notary public in and fo	or	County and State of Indiana
on this	day of,	_ 20 My Comm	ission expires:

Signature

Name

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

Technical Support Document (TSD) for Significant Permit Revision to a New Source Construction and Federally Enforceable State Operating Permit (FESOP)

#### **Source Description and Location**

Source Name:
Source Location:
County:
SIC Code:
Operation Permit No.:
<b>Operation Permit Issuance Date:</b>
Significant Permit Revision No.:
Permit Reviewer:

Globe Industrial, LLC./Globe Industries, LLC. 335 S. Voyles Road, Pekin, IN, 47165 Washington 3498 (Fabricated Pipe and Pipe Fittings) F175-35432-00030 July 21, 2015 F175-37411-00030 Renee Traivaranon

On July 19, 2016, the Office of Air Quality (OAQ) received an application from Globe Industrial, LLC./Globe Industries, LLC. related to a modification to an existing metal fabrication plant (primary purchased pipe and pipe fittings).

#### **Existing Approvals**

The source was issued FESOP No. F175-35432-00030, on July 21, 2015. There have been no subsequent approvals issued.

#### **County Attainment Status**

The source is located in Washington County.

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

#### (a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Washington County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM<sub>2.5</sub>

Washington County has been classified as attainment for  $PM_{2.5}$ . Therefore, direct  $PM_{2.5}$ ,  $SO_2$ , and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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

#### **Fugitive Emissions**

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

#### Status of the Existing Source

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

		Pot	ential To E	mit of the	Entire So (tons/yea		or to this r	evision	
Process/ Emission Unit	PM	PM10*	PM2.5*	SO <sub>2</sub>	NOx	voc	со	Total HAPs	Worst Single HAP
Paint Booth EU003**	6.00	6.00	6.00	0.0	0.0	51.83	0.0	22.0	9.0 Xylene
Blasting EU001***	27.25	23.44	23.44	0.0	0.0	0.0	0.0	0.0	-
Blasting EU002***	27.25	23.44	23.44	0.0	0.0	0.0	0.0	0.0	-
Welding EU004	3.76	3.76	3.76	0.0	0.0	0.0	0.0	0.88	0.88 Manganese
LPG Combustion	0.03	0.11	0.11	0.02	1.96	0.15	1.13	0.0	-
Paved Roads	0.11	0.02	0.01	0.0	0.0	0.0	0.0	0.0	-
Total PTE of Entire Source	64.41	56.76	56.74	0.02	1.96	51.98	1.13	22.88	9.0 Xylene
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	NA	NA

This PTE table is from the TSD of permit No.: F175-37411-00030, issued on July 21, 2015.

		Potential To Emit of the Entire Source Prior to this revision (tons/year)							
Process/ Emission Unit	PM	PM10*	PM2.5*	SO <sub>2</sub>	NOx	VOC	со	Total HAPs	Worst Single HAP
*Under the Part considered as a **In order to con IAC 2-7 (Part 7 booth EU003 sl twelve (12) mor Pursuant to dry particulate f manufacturer's assumption of 9 EU003 to the va ***In order to re applicable, PM, 5.35, and 5.35	a "regulated mply with the D Permits) nall not excent accent consect 326 IAC 6- ilters and the specification 25% capture alues show ander the re PM10, and	d air polluta he requirer and 326 IA æed 22.0 t utive period 3-2(d), the he Permitte ons. Comp e and cont m. equirement d PM2.5 er	ant". nents of 32 C 2-4.1 (M ons of tota d. particulate ee shall op liance with rrol, shall lin s of 326 IA missions fr	26 IAC 2- fajor Sou I combine e emissio erate the this stan mit PM, F AC 2-2 (PS	8-4 (FES rce of HA ed HAPs ns from F control d dard, in c 2M10, and SD) and 3	OP), and P) not ap and 9.0 to Paint Boo evices in onjunctio d PM2.5 o 326 IAC 2	render ti oplicable, ons of ea th EU003 accorda on with a emissions	he require the HAP ch single s shall be nce with conserva s from the 70 Progra	ements of 326 input to paint HAP per controlled by the tive e Paint Booth am) not

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAPs emissions to 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).

#### Description of Proposed revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Globe Industrial, LLC./Globe Industries, LLC. on July 19, 2016, relating to an addition of a new shot blast machine to the source.

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

(a) One (1) shot blast machine, identified as EU005, approved in 2016 for construction, with a maximum blasting rate of 144,000 pounds of steel shot per hour, using cartridges and baghouse C-03 for particulate control, and exhausting outdoors.

#### **Enforcement Issues**

There are no pending enforcement actions related to this revision.

#### **Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

#### Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

		PTE of Proposed Revision (tons/year)							
Process/ Emission Unit	PM	PM10	PM2.5	SO <sub>2</sub>	NOx	VOC	со	Total HAPs	Worst Single HAP
Shot blast machine, EU005	2,523	2,170	2,170	0.00	0.00	0.00	0.00	0.00	0.00
Total PTE of Proposed Revision	2,523	2,170	2,170	0.00	0.00	0.00	0.00	0.00	0.00

Pursuant to 326 IAC 2-8-11.1(f)(1)(A), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision.

It can not be revised through Minor Permit revision (Pursuant to 326 IAC 2-8-11.1(d)), since the new shot blast machine has greater than twenty-five (25) tons per year of PM, PM<sub>10</sub>, or direct PM<sub>2.5</sub>.

#### PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source (reflecting adjustment of existing *limits*), with updated emissions shown as **bold** values and previous emissions shown as strikethrough values.

	Po	tential To I	Emit of the	Entire So	urce to a (tons/yea		ate the P	roposed F	Revision
Process/ Emission Unit	PM	PM10*	PM2.5*	SO <sub>2</sub>	NOx	VOC	со	Total HAPs	Worst Single HAP
Paint Booth EU003**	6.00	6.00	6.00	0.0	0.0	51.83	0.0	22.0	9.0 Xylene
Blasting EU001***	27.25	23.44	23.44	0.0	0.0	0.0	0.0	0.0	-
Blasting EU002***	27.25	23.44	23.44	0.0	0.0	0.0	0.0	0.0	-
Shot Blast Machine EU005****	49.20	42.31	42.31	0.0	0.0	0.0	0.0	0.0	-
Welding EU004	3.76	3.76	3.76	0.0	0.0	0.0	0.0	0.88	0.88 Manganese
LPG Combustion	0.03	0.11	0.11	0.02	1.96	0.15	1.13	0.0	-
Paved Roads	0.11	0.02	0.01	0.0	0.0	0.0	0.0	0.0	-
Total PTE of Entire Source	64.41 113.60	<del>56.76</del> 99.07	<del>56.74</del> 99.05	0.02	1.96	51.98	1.13	22.88	9.0 Xylene
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	NA	NA

	Po	Potential To Emit of the Entire Source to accommodate the Proposed Revision							
					(tons/yea	ar)			
Process/								Total	Worst Single
<b>Emission Unit</b>	PM	PM10*	PM2.5*	SO <sub>2</sub>	NOx	VOC	CO	HAPs	НАР
*Under the Part	70 Permit	program (	40 CFR 70	), PM10	and PM2	.5, not pa	articulate	matter (P	M), are each
considered as a	"regulated	d air polluta	ant".						
**In order to cor	nply with th	ne requirer	ments of 32	26 IAC 2-	8-4 (FES	OP), and	d render t	he require	ements of 326
IAC 2-7 (Part 70	) Permits)	and 326 IA	C 2-4.1 (N	lajor Sou	rce of HA	P) not a	pplicable,	the HAP	input to paint
booth EU003 sh	nall not exc	eed 22.0 t	ons of tota	l combine	ed HAPs	and 9.0 t	ons of ea	ch single	HAP per
twelve (12) mor	twelve (12) month consecutive period.								
Pursuant to 3	326 IAC 6-	3-2(d), the	particulate	emissio	ns from F	Paint Boo	th EU003	3 shall be	controlled by
dry particulate f	ilters and t	he Permitte	ee shall op	erate the	control c	levices ir	n accorda	nce with	the
manufacturer's	specificatio	ons. Comp	liance with	this stan	dard, in c	conjunctio	on with a	conserva	tive
assumption of 9	5% captur	e and cont	rol, shall li	mit PM, F	PM10, an	d PM2.5	emission	s from the	e Paint Booth
EU003 to the va	alues show	'n.							
***In order to re	nder the re	quirement	s of 326 IA	C 2-2 (P	SD) and	326 IAC	2-7 (Part	70 Progra	am) not
applicable, PM, PM10, and PM2.5 emissions from each of the shot blast booths shall not exceed 6.22,									
5.35, and 5.35 pounds per hour, respectively.									
****Limited PT	E to rende	r the requ	irements	of 326 IA	C 2-2 (P	SD) and	326 IAC :	2-7 (Part	70 Program)
not applicable.									

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

Process/		Potentia	I To Emit of	the Entir	e Source (tons/yea		he Propos	sed Revis	ion
Emission Unit	РМ	PM10*	PM2.5*	SO₂	NOx	voc	СО	Total HAPs	Worst Single HAP
Paint Booth EU003**	6.00	6.00	6.00	0.0	0.0	51.83	0.0	22.0	9.0 Xylene
Blasting EU001***	27.25	23.44	23.44	0.0	0.0	0.0	0.0	0.0	-
Blasting EU002***	27.25	23.44	23.44	0.0	0.0	0.0	0.0	0.0	-
Shot Blast Machine EU005****	49.20	42.31	42.31	0.0	0.0	0.0	0.0	0.0	-
Welding EU004	3.76	3.76	3.76	0.0	0.0	0.0	0.0	0.88	0.88 Manganese
LPG Combustion	0.03	0.11	0.11	0.02	1.96	0.15	1.13	0.0	-
Paved Roads	0.11	0.02	0.01	0.0	0.0	0.0	0.0	0.0	-
Total PTE of Entire Source	113.60	99.07	99.05	0.02	1.96	51.98	1.13	22.88	9.0 Xylene
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	NA	NA

Process/	Potential To Emit of the Entire Source to After the Proposed Revision (tons/year)								ion
Emission Unit	РМ	PM10*	PM2.5*	SO <sub>2</sub>	NOx	VOC	СО	Total HAPs	Worst Single HAP

\*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".

\*\*In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Source of HAP) not applicable, the HAP input to paint booth EU003 shall not exceed 22.0 tons of total combined HAPs and 9.0 tons of each single HAP per twelve (12) month consecutive period.

Pursuant to 326 IAC 6-3-2(d), the particulate emissions from Paint Booth EU003 shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with the manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM10, and PM2.5 emissions from the Paint Booth EU003 to the values shown.

\*\*\*In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Program) not applicable, PM, PM10, and PM2.5 emissions from each of the shot blast booths shall not exceed 6.22, 5.35, and 5.35 pounds per hour, respectively.

\*\*\*\*Limited PTE to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Program) not applicable.

#### (a) FESOP Status

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

(1) Criteria Pollutants

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

- (1) the PM10 emissions from the Shot Blast Machine EU005 shall not exceed 9.66 pounds per hour.
- (2) the PM2.5 emissions from the Shot Blast Machine EU005 shall not exceed 9.66 pounds per hour.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), not applicable.

(b) PSD Minor Source – PM

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit PM from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

(1) the PM emissions from the Shot Blast Machine EU005 shall not exceed 11.23 pounds per hour.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable.

#### Federal Rule Applicability Determination

#### New Source Performance Standards (NSPS)

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

#### National Emission Standards for Hazardous Air Pollutants (NESHAP)

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

#### Compliance Assurance Monitoring (CAM)

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

#### State Rule Applicability Determination

- (a) 326 IAC 2-8-4 (FESOP) This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) This revision to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP revision Section above.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) The proposed shot blast machine is not subject to the requirements of 326 IAC 2-4.1, since there are no HAPs emissions from the revision.
- (d) 326 IAC 2-6 (Emission Reporting) Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

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

- . (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations) Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (g) 326 IAC 12 (New Source Performance Standards) See Federal Rule Applicability Section of this TSD.
- (h) 326 IAC 20 (Hazardous Air Pollutants) See Federal Rule Applicability Section of this TSD.

#### Shot Blast Machine

 (I) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the shot blast machine shall not exceed 48.04 pounds per hour when operating at a process weight rate of 72.00 tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

where E = rate of emission in pounds per hour; and

P = process weight rate in tons per hour

The baghouse shall be in operation at all times the shot blast machine is in operation, in order to comply with this limit.

Based on calculations, the source can comply with this limit using a baghouse for control.

(b) 326 IAC 8 The 326 IAC 8 does not apply to this shot blast machine, because it does not emit VOC.

#### Compliance Determination, Monitoring and Testing Requirements

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

<b>Emission Unit/Control</b>	<b>Operating Parameters</b>	Frequency
Shot blast machine/Baghouse	Pressure Drop	Once per day

These monitoring conditions are necessary because the baghouse for the Shot blast machine must operate properly to ensure compliance with, 326 IAC 2-2 (PSD), 326 IAC 2-8 (FESOP), 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Processes).

(b) The testing is required for this shot blast machine.

Summary of Testing Requirements							
Emission UnitControl DeviceTimeframe for TestingPollutantFrequency of TestingLimit* or Requirement (Ibs/hr)							
Shot blast machine	Cartridges and Baghouse	No later than 180 days after the initial start-up	PM, PM <sub>10</sub> and PM <sub>2.5</sub>	Once every five (5) years	PM = 11.23 $PM_{10} = 9.66$ $PM_{2.5} = 9.66$		

This testing is required for the shot blast machine since a high control efficiency of greater than 75% is required to comply with FESOP limit and to render PSD not applicable.

\* The control efficiency of 98.05% was used for these limits, and this is the lowest control efficiency for the source to comply with FESOP.

#### Proposed Changes

The following changes listed below are due to the proposed revision.

- (1) The description of the shot blast machine was added to Section A.2 and Section D.2 as item (d) and the following items have been re-numbers.
- (2) The emission limits of the shot blast machine have been added to Conditions D.2.1 and D.2.2. In addition, the Condition D.2.1 FESOP and PSD Minor Limits [326 IAC 2-8] [326 IAC 2-2] has been separated to Conditions D.2.1 PSD Minor Limit and D.2.2 FESOP PSD Minor Limits. Therefore, all the following existing Conditions have been re-numbers.
- (3) Testing for the shot blast machine has been added as a Condition D.2.5.
- (4) The existing Conditions D.2.4 and D.2.5 (current Conditions D.2.6 and D.2.7) have been revised to add the shot blast machine.
- (5) The existing Condition D.2.7 (current Condition D.2.9) has been revised to add a daily record keeping for shot blast machine pressure drop.
- (6) IDEM, OAQ made additional revision to the permit as follows:
  - (i) The FESOP Emergency Occurrence Report. 326 IAC 2-8-12 states that the Permittee must notify IDEM within "four (4) daytime business hours" for emergencies. The FESOP Emergency Occurrence Report Form lacked the word 'daytime'. 'Daytime' is being added to be consistent with the rule.
  - (ii) The existing rule cite is being corrected to refer to the FESOP rules in the FESOP Emergency Occurrence Report.

The permit has been revised as follows with deleted language appears as strikethrough text and new language appears as **bold** text:

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

- (d) One (1) shot blast machine, identified as EU005, approved in 2016 for construction, with a maximum blasting rate of 144,000 pounds of steel shot per hour, using cartridges and baghouse C-03 for particulate control, and exhausting outdoors.
- (de) One (1) welding and plasma cutting operation, identified as EU004, constructed in 2015, consisting of ten (10) metal inert gas welding stations, two (2) submerged arc welding stations, three (3) semi-automatic plasma cutting stations, and two (2) manual plasma torch cutting stations, using no controls and exhausting to vent V-004.
- (ef) One (1) liquefied petroleum gas-fired boiler, identified as LPG Boiler, constructed in 2014, with a maximum heat input capacity of 3.00 MMBtu per hour.
- (fg) Two (2) liquefied petroleum gas-fired space heaters, identified as LPG Space Heaters, constructed in 2014, with a maximum heat input capacity of 0.12 MMBtu per hour, respectively.

. . . . .

#### SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) shot blast booth, identified as EU001, constructed in 2014, with a maximum throughput of 6,222 pounds of steel shot per hour, using baghouse C-01 as control, and exhausting indoors.
- (c) One (1) shot blast booth, identified as EU002, constructed in 2015, with a maximum throughput of 6,222 pounds of steel shot per hour, 2,044 pounds of aluminum oxide per hour, or 1,277 pounds of black beauty per hour, using baghouse C-02 as control, and exhausting indoors.
- (d) One (1) shot blast machine, identified as EU005, approved in 2016 for construction, with a maximum blasting rate of 144,000 pounds of steel shot per hour, using cartridges and baghouse C-03 for particulate control, and exhausting outdoors.
- (de) One (1) welding and plasma cutting operation, identified as EU004, constructed in 2015, consisting of ten (10) metal inert gas welding stations, two (2) submerged arc welding stations, three (3) semi-automatic plasma cutting stations, and two (2) manual plasma torch cutting stations, using no controls and exhausting to vent V-004.

(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 PSD Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM emissions from the following units shall not exceed the limits specified in the table below:

Emission Unit	Control Device	PM Limit (lb/hr)
Shot Blast Booth EU001	Baghouse C-01	6.22
Shot Blast Booth EU002	Baghouse C-02	6.22
Shot Blast Machine EU005	Cartridges and Baghouse C-03	11.23

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit PM emissions from the entire source to less than 250 tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### D.2.42 FESOP and PSD Minor Limits [326 IAC 2-8] [326 IAC 2-2]

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the <del>PM,</del> PM10, and PM2.5 emissions **after control** from the following units shall not exceed the limits specified in the table below:

Emission Unit	Control Device	<del>PM Limit</del> <del>(lb/hr)</del>	PM10 Limit (lb/hr)	PM2.5 Limit (lb/hr)
Shot Blast Booth EU001	Baghouse C-01	<del>6.22</del>	5.35	5.35
Shot Blast Booth EU002	Baghouse C-02	<del>6.22</del>	5.35	5.35
Shot Blast Machine EU005	Cartridges and Baghouse C-03	-	9.66	9.66

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit PM emissions from the entire source to less than 250 tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 from all other emission units at this source, shall limit PM10 and PM2.5 emissions from the entire source to less than 100 tons per 12 consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-7 (Part 70 Permits) not applicable.

#### D.2.23 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the following operations with the following process weight rate shall be limited as shown in the table below:

	Process	Allowable PM
Emission Unit	Weight Rate	Emission Rate
	(ton/hr)	(lb/hr)
Shot Blast Booth EU001	3.911	10.22
Shot Blast Booth EU002	3.911	10.22
Shot Blast Machine EU005	72.00	48.04
EU004 (Welding)	0.033	0.551
EU004 (Plasma Cutting)	0.05	0.551

The pounds per hour limitations were calculated with the following equation:

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

 $E = 4.10 * P^{0.67}$ 

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

or

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

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

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

D.2.34 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

**Compliance Determination Requirements** 

#### D.2.5 Testing Requirements [326 IAC 2-7-6(1), (6)]

(a) In order to demonstrate the compliance status with Conditions D.2.1, D.2.2 and D.2.3, the Permittee shall conduct PM, PM<sub>10</sub> and PM<sub>2.5</sub> testing for shot blast machine EU005, no later than 180 days after the initial start-up of the shot blast machine, utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration.

PM<sub>10</sub> and PM<sub>2.5</sub> includes filterable and condensable PM.

- (b) Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.
- D.2.46 Particulate Control
  - (a) In order to comply with Conditions D.2.1, and D.2.2 and D.2.3, the baghouses for particulate control for PM, PM10 and PM2.5 control shall be in operation and control emissions from the shot blast booths/machine (EU001, and EU002, and EU005) at all times that the shot blast booths are in operation.

. . . . . .

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

D.2.47 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses, at least once per day when the shot blast booths/machine are in operation. When for any one reading, the pressure drop across the baghouses are outside the normal range, the Permittee shall take reasonable response steps. The normal range for the baghouses associated with:

(a) shot blast booths EU001 and EU002 is a pressure drop between 2.5 and 4.5 inches of water;

# (b) shot blast machine EU005 is a pressure drop between 2.5 and 5.0 inches of water, unless a different upper-bound or lower-bound value for this range is determined during the latest stack test.

Section C - Response to Excursions 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.

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, or other time period specified by the manufacturer. The Permittee shall maintain records of the manufacturer specifications, if used.

#### D.2.58 Broken or Failed Bag Detection

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

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

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

#### D.2.79 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.57, the Permittee shall maintain daily records of the pressure drop across each of the baghouses associated with the shot blast booths and shot blast machine. 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); and
- (b) Section C General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) EMERGENCY OCCURRENCE REPORT

...

Source Name:	Globe Idustrial, LLC./Globe Industries, LLC
Source Address:	335 S. Voyles Road, Pekin, Indiana 47165
FESOP Permit No.:	F175-35432-00030

#### This form consists of 2 pages

Page 1 of 2

- □ This is an emergency as defined in 326 IAC 2-7-1(12)
  - The Permittee must notify the Office of Air Quality (OAQ), within four (4) **daytime** business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-162-8-12

. . . .

#### **Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application. An application for the purposes of this review was received on July 19, 2016.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. F175-37411-00030. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

#### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Ms. Renee Traivaranon at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5615 or toll free at 1-800-451-6027 extension 4-5615.
- (b) A copy of the findings is available on the Internet at: <u>http://www.in.gov/ai/appfiles/idem-caats/</u>
- (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: <u>http://www.in.gov/idem/5881.htm</u>; and the Citizens' Guide to IDEM on the Internet at: <u>http://www.in.gov/idem/6900.htm</u>.

#### Appendix A: Emissions Calculations Emissions Summary

#### Company Name: Globe Industrial LLC/Globe Industries LLC Source Address: 335 S. Voyles Road, Pekin, IN 47165 Permit Number: F175-35432-00030 Significant Permit Revision No.: F175-37411-00030 Reviewer: Renee Traivaranon

Uncontrolled/Unlimited Pote Emission Units	PM	PM10	PM2.5	SO2	NOx	voc	со	Total HAPs	Highe	st Single HAP
Paint Booth EU003	120.04	120.04	120.04	0.00	0.00	51.83	0.00	63.35	48.57	Xylene
Blasting EU001	109.01	93.75	93.75	0.00	0.00	0.00	0.00	0.00	0.00	-
Blasting EU002	109.01	93.75	93.75	0.00	0.00	0.00	0.00	0.00	0.00	-
Shot Blast Machine EU005	2,522.9	2,169.7	2,169.7	0.00	0.00	0.00	0.00	0.00	0.00	-
Welding EU004	3.76	3.76	3.76	0.00	0.00	0.00	0.00	0.88	0.88	Manganese
LPG Combustion	0.03	0.11	0.11	0.02	1.96	0.15	1.13	0.00	0.00	-
Paved Roads	0.11	0.02	0.01	0.00	0.00	0.00	0.00	0.00	0.00	-
Total	2,864.8	2,481.1	2,481.1	0.02	1.96	51.98	1.13	64.23	48.57	Xylene

#### Limited Potential to Emit (PTE) (tons/year)

Emission Units	РМ	PM10	PM2.5	SO2	NOx	voc	со	Total HAPs	Highe	est Single HAP
Paint Booth EU003*	6.00	6.00	6.00	0.00	0.00	51.83	0.00	22.00	9.00	Xylene
Blasting EU001**	27.25	23.44	23.44	0.00	0.00	0.00	0.00	0.00	0.00	-
Blasting EU002**	27.25	23.44	23.44	0.00	0.00	0.00	0.00	0.00	0.00	-
Shot Blast Machine EU005***	49.20	42.31	42.31	0.00	0.00	0.00	0.00	0.00	0.00	-
Welding EU004	3.76	3.76	3.76	0.00	0.00	0.00	0.00	0.88	0.88	Manganese
LPG Combustion	0.03	0.11	0.11	0.02	1.96	0.15	1.13	0.00	0.00	-
Paved Roads	0.11	0.02	0.01	0.00	0.00	0.00	0.00	0.00	0.00	-
Total	113.60	99.07	99.05	0.02	1.96	51.98	1.13	22.88	9.00	Xylene

#### Limited and Controlled Potential to Emit (PTE) (tons/year)

Emission Units	РМ	PM10	PM2.5	SO2	NOx	VOC	со	Total HAPs	Highe	st Single HAP
Paint Booth EU003*	6.00	6.00	6.00	0.00	0.00	51.83	0.00	22.00	9.00	Xylene
Blasting EU001**	0.22	0.19	0.19	0.00	0.00	0.00	0.00	0.00	0.00	-
Blasting EU002**	0.22	0.19	0.19	0.00	0.00	0.00	0.00	0.00	0.00	-
Shot Blast Machine EU005***	5.05	4.34	4.34	0.00	0.00	0.00	0.00	0.00	0.00	-
Welding EU004	3.76	3.76	3.76	0.00	0.00	0.00	0.00	0.88	0.88	Manganese
LPG Combustion	0.03	0.11	0.11	0.02	1.96	0.15	1.13	0.00	0.00	-
Paved Roads	0.10	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-
Total	15.37	14.60	14.58	0.02	1.96	51.98	1.13	22.88	9.00	Xylene

\*In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), and render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-4.1 (Major Source of HAP) not applicable, the HAP input to paint booth EU003 shall not exceed 22.0 tons of total combined HAPs and 9.0 tons of each single HAP per twelve (12) month consecutive period.

Pursuant to 326 IAC 6-3-2(d), the particulate emissions from Paint Booth EU003 shall be controlled by dry particulate filters and the Permittee shall operate the control devices in accordance with the manufacturer's specifications. Compliance with this standard, in conjunction with a conservative assumption of 95% capture and control, shall limit PM, PM10, and PM2.5 emissions from the Paint Booth EU003 to the values shown.

\*\*In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Program) not applicable, PM, PM10, and PM2.5 emissions from each of the shot blast booths shall not exceed 6.22, 5.35, and 5.35 pounds per hour, respectively.

\*\*\*In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Program) not applicable, PM, PM10, and PM2.5 emissions from the shot blast machine shall not exceed 11.23 and 9.66 and 9.66 pounds per hour, respectively.

#### Appendix A: Emission Calculations Coating Compositions Paint Booth EU003

Company Name:Globe Industrial LLC/Globe Industries LLCSource Address:335 S. Voyles Road, Pekin, IN 47165Permit Number:F175-35432-00030Significant Permit Revision No.:F175-37411-00030Reviewer:Renee Traivaranon

#### Weighted Average Densities for Coatings as Applied:

Coating	Part	Density (lb/gal)	Composition (%)	Weighted Density (lb/gal)	As Applied Density (lb/gal)
Acrolon 218 HS Polyurethane	A B	11.23 9.41	86.00% 14.00%	9.658 1.317	10.98
Масгороху	A	11.94 13.43	50.00% 50.00%	5.970 6.715	12.69
Cor-Cote HT	A B	11.38 7.71	80.00% 20.00%	9.104	10.65
EnviroLastic 980	A B	13.41 8.54	67.00% 13.00%	8.985 1.110	11.76
	Water	8.34	20.00%	1.668	11.70
Hi Solids Polyurethane	S T	11.33 8.44	80.00% 20.00%	9.064 1.688	10.75
Carobzinc	A B Filler	10.85 7.34 59.33	19.00% 7.60% 73.40%	2.062 0.558 43.548	46.17
Zinc Clad II LV	A F	9.37 58.6	29.40% 70.60%	2.755 41.372	44.13
Zinc Clad II Ethyl Silicate	E F	8.17 58.6	75.00% 25.00%	6.128 14.650	20.78

#### Methodology:

[Weighted Density (lb/gal)] = [Density (lb/gal)] \* [Composition (%)]

[As Applied Density (lb/gal) = Sum of each Part's [Weighted Density (lb/gal)] for each Coating

#### Appendix A: Emissions Calculations Surface Coating VOC and Particulate Paint Booth EU003

#### Page 3 of 11 TSD App A

Company Name: Globe Industrial LLC/Globe Industries LLC Source Address: 335 S. Voyles Road, Pekin, IN 47165 Permit Number: F175-53432-00030 Significant Permit Revision No.: F175-37411-00030

				Reviewer:	Renee Traiv	aranon								
Material	Density (Lb/Gal)*	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	gallons per unit**	Units per hour**	Maximum Hours of Operation (hours/day)**	Maximum Usage (gal/day)	Pounds VOC per gallon of coating***	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Acrolon 218 HS Polyurethane														
Part A	11.23	64.00%	40.7%	23.3%					2.87					
Part B	9.41	0.00%	0.0%	0.0%					0.00					
As Applied	10.98	55.04%	35.00%	20.0%	0.03	103.125	24	74.3	2.47	7.64	183.26	33.45	16.72	75%
Part A	44.04	00.00%	40.00/	00.00/					0.00					
Part A Part B	11.94	69.00% 14.00%	40.0%	29.0%					2.09					
	13.43		1.7% 20.85%	12.3%	0.00	400.405	04	74.0		6.76	400.44	05.00	05.44	750/
As Applied	12.69	41.50%	20.85%	20.7%	0.03	103.125	24	74.3	1.86	5.75	138.11	25.20	25.14	75%
Cor-Cote HT														
Part A	11.38	28,90%	13.9%	15.0%					1.74					
Part B	7.71	22.00%	2.0%	20.0%					1.12					
As Applied	10.65	27.52%	11.52%	16.0%	0.03	103.125	24	74.3	1.62	5.00	119.99	21.90	26.14	75%
									•					
EnviroLastic 980														
Part A	13.41	44.00%	11.0%	33.0%					2.49					
Part B	8.54	29.00%	0.6%	28.4%					2.36					
Water	8.34	100.00%	100.0%	0.0%					0.00					
As Applied	11.76	53.25%	27.45%	25.8%	0.03	103.125	24	74.3	1.98	6.11	146.65	26.76	18.63	75%
Hi Solids Polyurethane														
Part S	11.33	66.00%	46.0%	20.0%					2.45					
Part T	8.44	29.00%	0.0%	29.0%					2.48					
As Applied	10.75	58.60%	36.80%	21.8%	0.03	103.125	24	74.3	2.46	7.60	182.36	33.28	15.08	75%
Carbozinc														
Part A	10.85	85.00%	0.0%	85.0%					2.72					
Part B	7.34	100.00%	0.0%	100.0%					2.72					
Filler	59.33	0.00%	0.0%	0.0%					0.00					
As Applied	46.17	23.75%	0.00%	23.8%	0.03	103.125	24	74.3	0.00	2.24	53.72	9.80	119.25	75%
A3 Applied	40.17	20.1070	0.0070	20.070	0.00	100.120	27	74.5	0.72	2.27	33.72	5.00	113.25	1570
Zinc Clad II LV														
Part A	9.37	67.00%	33.7%	33.3%					4.21					
Part F	58.60	0.00%	0.0%	0.0%					0.00					
As Applied	44.13	19.70%	9.91%	9.8%	0.03	103.125	24	74.3	1.24	3.83	91.90	16.77	120.04	75%
					•		•							
Zinc Clad II Ethyl Silicate														
Part E	8.17	86.00%	30.0%	56.0%					5.10					
Part F	58.60	0.00%	0.0%	0.0%					0.00					
As Applied	20.78	64.50%	22.50%	42.0%	0.03	103.125	24	74.3	3.83	11.83	284.01	51.83	24.99	75%
									Total PTE	11.83	284.01	51.83	120.04	
										Dry Fi	ter Control Eff	iciencv****	95.0%	1
										DIYFI	ter control Ell	loioney	33.076	

PTE of PM/PM10/PM2.5 After Control (tons/year) 6.00

\*As Applied density calculations can be found on page 2 of TSD Appendix A \*\*The source applies 0.03 gal of coating per square foot of piping. They can process about 825 sq ft of piping per 8-hour period (average of 103.125 sq ft/hr). The source indicates that it applies coating during an 8 hour period and then allowes the part to dry overnight (16 hours of downtime). As a worst case scenario, IDEM OAQ has calculated the maximum paint usage assuming that the paint booth applies coating 24 hours per day, 365 days per year. \*\*\*Ounds VOC per gallon of coating taken from MSDS. \*\*\*Controlled particulate emissions are calculated using an efficiency of 95% to be conservative. The Permittee has indicated that the dry filters can achieve 98.2% efficiency.

 Methodology

 Pounds of VOC per Galion Coating = (Density (Ib/gal) \* Weight % Organics)

 Pounds of VOC per Galion Coating = (Density (Ib/gal) \* Weight % Organics)

 Potential VOC Pounds per Hour = Pounds of VOC per Galion coating (Ib/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

 Potential VOC Pounds per Hour = Pounds of VOC per Galion coating (Ib/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

 Potential VOC Pounds per Hour = Pounds of VOC per Galion coating (Ib/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

 Potential VOC Pounds per Vear = Pounds of VOC per Galion coating (Ib/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (260 hr/yr) \* (1 ton/2000 lbs)

 Particulate Potential Tons per Year = (nits/hour) \* (gal/unit) \* (Ib/gal) \* (1 - Weight % Organics) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

 Pounds VOC per Galion = (Density (Ib/gal) \* (Weight % organics)

 PM is assumed to be equal to PM10 and PM2.5.

Appendix A: Emissions Calculations Surface Coating Hazardous Air Pollutants (HAPs) Paint Booth EU003

# Company Name: Globe Industrial LLC/Globe Industries LLC Source Address: 335 S. Voyles Road, Pekin, IN 47165 Permik Number: F175-3542.00030 Significant Permik Revision No.: F175-37411-00030 Reviewer: Renee Traivaranon

Material	Density (Lb/Gal)*	gallons per unit**	Units per hour**	% Toluene	% Xylene	% Napthalene	% Ethyl benzene	% Methyl Isobutyl Ketone	% Hexamethylene diisocyanate	% N- Butanol	% Methanol	% 1,2,4- Trimethylbenzene	Toluene (tons/yr)	Xylene (tons/yr)	Napthalene (tons/yr)	Ethyl benzene (tons/yr)	Methyl Isobutyl Ketone (tons/yr)	Hexamethylene diisocyanate (tons/yr)	N-Butanol (tons/yr)	Methanol (tons/yr)	% 1,2,4- Trimethylbenzene	Total HAP (tons/yr)
Acrolon 218 HS Polyurethan																						
Part A	11.23			0.0%	0.0%	0.2%	0.1%	3.0%	0.0%	0.0%	0.0%	0.0%										
Part B	9.41			0.0%	0.0%	0.0%	0.0%	0.0%	1.0%	0.0%	0.0%	0.0%										
As Applied	10.98	0.03	103.125	0.0%	0.0%	0.2%	0.1%	2.6%	0.1%	0.0%	0.0%	0.0%	0.00	0.00	0.26	0.13	3.84	0.21	0.00	0.00	0.00	4.43
Macropoxy																						
Part A	11.94			0.0%	15.0%	0.0%	3.0%	0.0%	0.0%	0.0%	0.0%	0.0%										1
Part B	13.43			0.0%	2.0%	0.0%	0.3%	10.0%	0.0%	0.0%	0.0%	0.0%										4
As Applied	12.69	0.03	103.125	0.0%	8.5%	0.0%	1.7%	5.0%	0.0%	0.0%	0.0%	0.0%	0.00	14.61	0.00	2.84	8.59	0.00	0.00	0.00	0.00	26.04
Cor-Cote HT																						
Part A	11.38			0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%										
Part B	7.71			0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%										
As Applied	10.65	0.03	103.125	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
EnviroLastic 980																						
Part A	13.41			0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.0%										
Part B	8.54			0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%										
Water	8.34			0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%										
As Applied	11.76	0.03	103.125	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.20	3.20
Hi Solids Polyurethane																						
Part S	11.33			0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%										
Part T	8.44			0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%										
As Applied	10.75	0.03	103.125	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Carbozinc																						
Part A Part B	6.57 8.16	-		25% 50%	5%	0%	1%	0%	0%	5% 0%	0%	0%										4
Filler	8.16			0%	5% 0%	0%	1% 0%	0% 0%	0%	0%	0%	0%										<u> </u>
As Applied	10.85	0.03	103,125	9%	1%	0%	0%	0%	0%	1%	0%	0%	12.57	1.96	0.00	0.52	0.00	0.00	1.40	0.00	0.00	16,45
, to Applied	.5.05	0.00	100.120	376	. 70	070	070	570	570	. 70	576	<b>270</b>	12.01	1.30	0.00	0.02	0.00	0.00		0.00	0.00	
Zinc Clad II LV																						
Part A	9.37			0.0%	0.0%	0.2%	0.0%	1.0%	0.0%	0.0%	1.0%	0.0%		_		_				_		
Part F	58.60			0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%										
As Applied	44.13	0.03	103.125	0.0%	0.0%	0.2%	0.0%	0.8%	0.0%	0.0%	0.8%	0.0%	0.00	0.00	0.90	0.00	4.48	0.00	0.00	4.48	0.00	9.87
Zinc Clad II Ethyl Silicate																						
Part E	8.17			0.0%	23.0%	0.0%	4.0%	2.0%	0.0%	0.0%	1.0%	0.0%										
Part F	58.60			0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%										
As Applied	20.78	0.03	103.125	0.0%	17.3%	0.0%	3.0%	1.5%	0.0%	0.0%	0.8%	0.0%	0.00	48.57	0.00	8.45	4.22	0.00	0.00	2.11	0.00	63.35
												Total PTE	12.57	48.57	0.90	8.45	8.59	0.21	1.40	4.48	3.20	63.35

\*As Applied density calculations can be found on page 2 of TSD Appendix A \*The source applies 0.03 gal of coating per square foot of piping. They can process about 825 sq ft of piping per 8-hour period (average of 103.125 sq ft/hr). The source indicates that it applies coating during an 8 hour period and then allowes the part to dry overnight (16 hours of downtime). As a worst case scenario, IDEM OAQ has calculated the maximum paint usage assuming that the paint booth applies coating 24 hours per day, 365 days per year.

Methodology PTE of HAP (tons/year) = Density (lb/gal) \* Maximum Throughput (units/hour) \* Maximum Usage (gal/unit) \* Weight % HAP \* 8760 hours/year \* 1 ton/2000 lbs

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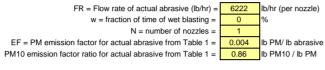
#### Appendix A: Emission Calculations Abrasive Blasting - EU001

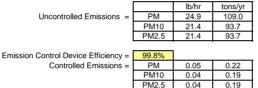
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#### Company Name: Globe Industrial LLC/Globe Industries LLC Source Address: 335 S. Voyles Road, Pekin, IN 47165 Permit Number: F175-35432-00030 Significant Permit Revision No.: F175-37411-00030 Reviewer: Renee Traivaranon

#### Table 1 - Emission Factors for Abrasives

	Emission	n Factor (EF)
Abrasive	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	





	PSD Mind	or Limited E	Emissions
Limited Control Efficiency =	75.0%		
		lb/hr	tons/yr
Limited Emissions =	PM	6.22	27.25

PM10

PM2.5

5.35

5.35

23 44

MET	THODO	LOGY

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

Potential to Emit (before control) = EF x FR

- Potential to Emit (after control) Potential to Emit (tons/vear)
- = EF x FR x (1 w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))
- = [Potential to Emit (before control)] \* [1 control efficiency]
  - = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]

#### 326 IAC 6-3-2 Allowable Emission Rate

Process	Blasting Media PWR	Metal Throughput PWR	6-3-2 Limit
	(ton/hr)	(ton/hr)*	(lb/hr)
EU002	3.11	0.80	10.22

\*Data obtained from source, calculated using formula shown below.

[Metal Throughput PWR (ton/hr)] = ([Maximum Capacity of Blasting Room (32,000 lbs)] / [Total Blasting Time (20 hours)]) / [2000 (lbs)]

#### Appendix A: Emission Calculations Abrasive Blasting - EU001

# Company Name: Globe Industrial LLC/Globe Industries LLC Source Address: 335 S. Voyles Road, Pekin, IN 47165 Permit Number: F175-35432-00030 Significant Permit Revision No.: F175-37411-00030 Reviewer: Renee Traivaranon

Table 1 - Emission Factors for Abrasives

	Emission Factor									
Abrasive	lb PM / lb abrasive	lb PM <sub>10</sub> / lb PM								
Sand	0.041	0.700								
Grit	0.010	0.700								
Steel Shot	0.004	0.860								
Aluminum Oxide / Black Beauty	0.010	0.700								

#### CALCULATIONS

		Steel Shot		Aluminum O:	kide	Black Beauty	
			_		_		_
FR = Flow rate of actual abrasiv	e (lb/hr) =	6222	lb/hr (per nozzle)	2044	lb/hr (per nozzle)	1277	lb/hr (per nozzle)
w = fraction of time of wet	blasting =	0	%	0	%	0	%
N = number of	nozzles =	1		1		1	
PM10 emission factor ratio for actual abrasive from	Table 1 =	0.004	Ib PM/ Ib abrasive	0.010	Ib PM/ Ib abrasive	0.010	Ib PM/ Ib abrasive
PM10 emission factor ratio for actual abrasive from	Table 1 =	0.86	lb PM10 / lb PM	0.70	lb PM10 / lb PM	0.70	lb PM10 / lb PM
			-		-		-
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Uncontrolled Emissions =	PM	24.9	109.0	20.4	89.5	12.8	55.9
	PM10	21.4	93.7	17.6	77.0	11.0	48.1
	PM2.5	21.4	93.7	17.6	77.0	11.0	48.1
Emission Control Device Efficiency =	99.8%						
Controlled Emissions =	PM	0.05	0.22	0.04	0.18	0.03	0.11
	PM10	0.04	0.19	0.04	0.15	0.02	0.10
	PM2.5	0.04	0.19	0.04	0.15	0.02	0.10

#### **PSD Minor Limited Emissions**

nited Control Efficiency =	75.0%		
		lb/hr	tons/yr
Limited Emissions =	PM	6.22	27.25
	PM10	5.35	23.44
	PM2.5	5.35	23.44

#### METHODOLOGY

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

 Potential to Emit (before control)
 = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))

 Potential to Emit (after control)
 = [Potential to Emit (before control)] \* [1 - control efficiency]

 = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs] Potential to Emit (tons/year)

#### 326 IAC 6-3-2 Allowable Emission Rate

Process	Blasting Media PWR	Metal Throughput PWR	6-3-2 Limit
	(ton/hr)	(ton/hr)*	(lb/hr)
EU002	3.11	0.80	10.22

Lir

\*Data obtained from source, calculated using formula shown below. [Metal Throughput PWR (ton/hr)] = ([Maximum Capacity of Blasting Room (32,000 lbs)] / [Total Blasting Time (20 hours)]) / [2000 (lbs)]

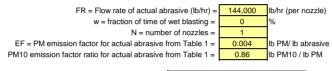
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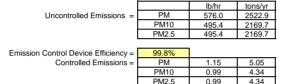
#### Appendix A: Emission Calculations Shot Blast machine - EU005

Company Name: Globe Industrial LLC/Globe Industries LLC Source Address: 335 S. Voyles Road, Pekin, IN 47165 Permit Number: F175-35432-00030 Significant Permit Revision No.: F175-37411-00030 Reviewer: Renee Traivaranon

Table 1 - Emission Factors for Abrasives

Emission	Factor (EF)
lb PM / lb abrasive	lb PM10 / lb PM
0.041	0.70
0.010	0.70
0.004	0.86
0.010	
	lb PM / lb abrasive 0.041 0.010 0.004





	PSD Mind	or Limited Emissions
Control Efficiency =	98.1%	

		lb/hr	tons/yr
Limited Emissions =	PM	11.23	49.20
	PM10	9.66	42.31
	PM2.5	9.66	42.31

#### METHODOLOGY

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

= EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50)) = [Potential to Emit (before control)] \* [1 - control efficiency] Potential to Emit (before control)

Potential to Emit (after control)

= [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]

#### 326 IAC 6-3-2 Allowable Emission Rate

Potential to Emit (tons/vear)

Unit	Process W	Process Weight Rate (P)						
Onic	(lbs/hr)	(ton/hr)	(lb/hr)					
EU005	144,000.00	72.00	48.04					

#### Methodology

Allowable Emissions = 55.0 [Process Weight Rate (tons/hr)]^0.11 - 40 Allowable Emiss E = 55.0 P  $^{0.11}$  – 40

#### Appendix A: Emissions Calculations Welding and Thermal Cutting EU004

Company Name: Globe Industrial LLC/Globe Industries LLC Source Address: 335 S. Voyles Road, Pekin, IN 47165 Permit Number: F175-35432-00030 Significant Permit Revision No.: F175-37411-00030 Reviewer: Renee Traivaranon

PROCESS	Number of Stations	Max. electrode consumption per	Electrode Consumption			N FACTORS				E	MISSIONS (lbs/hr)			HAP
WELDING		station (lbs/hr)	(lb/hr)	$PM = PM_{10}/PM_{2.5}$	Mn	Ni	Co	Cr	PM = PM10/PM2.5	Mn	Ni	Co	Cr	(lbs/hr)
Metal Inert Gas (MIG) - carbon steel	10	5.00	50.00	0.0055	0.0005	1.0E-06	0	1.0E-06	0.275	0.0250	5.0E-05	0	5.0E-05	0.025
Submerged Arc (MIG) - carbon steel	2	8.00	16.00	0.0360	0.0110	0	0	0	0.576	0	0	0	0	0
		Total Electrodes	66.00											
	Number of Stations	Max. Metal Thickness	Max. Metal Cutting Rate	EMISSION FACTORS**** (lb pollutant/1,000 inches cut)**			EMISSIONS (lbs/hr)				HAP			
FLAME CUTTING		Cut (in.)	(in./minute)	$PM = PM_{10}/PM_{2.5}$	Mn	Ni	Co	Cr	PM = PM10/PM2.5	Mn	Ni	Co	Cr	(lbs/hr)
Semi-automatic Plasma**	3	1.5000	10.00	0.00220	3.3E-05	0	0	0	0.0059	8.9E-05	0	0	0	8.91E-05
Manual Plasma Torch**	2	0.3800	8.00	0.00220	3.3E-05	0	0	0	0.0008	1.20E-05	0	0	0	0.0000
		Total cut	18.00											·
EMISSION TOTALS									PM = PM10/PM2.5	Mn	Ni	Co	Cr	Total HAP
								ons lbs/hr =	0.86	0.201	0.00005	0	0.00005	0.201
								ns lbs/day =		4.83	0.00120	0	0.00120	4.83
						Potential E	missions	tons/year =	3.76	0.88	0.00022	0	0.0002	0.88

#### METHODOLOGY

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

\*\*Emission Factor for plasma/arc carbon cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick; Estimated at 4.55 mm or 0.1793 inches = 0.0022 lb/1,000 inches.

\*\*\*\*HAP emission factors based upon the cutting of carbon steel that is a maxiumum of 1.5% manganese by weight.

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick adjusted to 0.1793 in. thickness)

Plasma cutting and laser cutting HAP emissions are calculated as (fume emission rate x weight % of component in product cut).

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Maximum daily rod/wire usage = Total electrodes (lb/hr) \*24 = Maximum inches cut per hour = Total cut (in/min) \* 60 =

1584 lbs of rod & wire/24 hours 1080

in of steel/hr

Pursuant to 6-3-1(b)(9), the welding performed at this source is not exempt from the requirements of 6-3-2. Pursuant to 6-3-1(b)(10), the cutting performed at this source is not exempt from the requirements of 6-3-2.

#### Appendix A: Emission Calculations LPG-Propane - Space Heaters (Heat input capacity: > 10 MMBtu/hr and < 100 MMBtu/hr)

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Company Name:	Globe Industrial LLC/Globe Industries LLC
Source Address:	335 S. Voyles Road, Pekin, IN 47165
Permit Number:	F175-35432-00030
Significant Permit Revision No.:	F175-37411-00030
- Reviewer:	Renee Traivaranon

Heat Input Capacity	Potential Throughput	SO2 Emission factor = 0.10 x S		_	Emission Units	Rating in MMBtu/hr
MMBtu/hr	kgals/year	S = Sulfur Content =	1.50	grains/100ft^3	LPG Boiler	3
				_	LPG Space Heaters (2)	0.24
3.24	301.94				Total	3.24

		Pollutant					
	PM*	PM10*	direct PM2.5**	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.20	0.70	0.70	0.15	13.00	1.00	7.50
				(0.10S)		**TOC value	
Potential Emission in tons/yr	0.03	0.11	0.11	0.02	1.96	0.15	1.13

\*PM emission factor is filterable PM only. PM emissions are stated to be all less than 10 microns in aerodynamic equivalent diameter, footnote in Table 1.5-1, therefore PM10 is based on the filterable and condensable PM emission factors.

Toothote in Table 1.5-1, therefore PMT0 is based on the interable and condensable PM emission factors.

\*\* No direct PM2.5 emission factor was given. Direct PM2.5 is a subset of PM10. If one assumes all PM10 to be all direct PM2.5,

then a worst case assumption of direct  $\widetilde{\mathsf{PM2.5}}$  can be made.

\*\*The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

#### Methodology

1 gallon of LPG has a heating value of 94,000 Btu

1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (7/08), Table 1.5-1 (SCC #1-02-010-02) Propane Emission Factors shown. Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

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

#### Company Name: Globe Industrial LLC/Globe Industries LLC Source Address: 335 S. Voyles Road, Pekin, IN 47165 Permit Number: F175-35432-00030 mit Revision No.: F175-37411-00030 Significant Permit Revision No.:

Reviewer: Renee Traivaranon

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

Vehicle Informtation (provided by source)									
	Maximum								
	number of	Number of one-	Maximum trips	Maximum	Total Weight	Maximum one-	Maximum one-	Maximum one-	Maximum one-
	vehicles per	way trips per	per day	Weight Loaded	driven per day	way distance	way distance	way miles	way miles
Туре	day	day per vehicle	(trip/day)	(tons/trip)	(ton/day)	(feet/trip)	(mi/trip)	(miles/day)	(miles/yr)
Vehicle (entering plant) (one-way trip)	1.0	1.0	1.0	23.5	23.5	739	0.140	0.1	51.1
Vehicle (leaving plant) (one-way trip)	1.0	1.0	1.0	23.5	23.5	739	0.140	0.1	51.1
		Totals	2.0		47.0			0.3	102.2

Average Vehicle Weight Per Trip = Average Miles Per Trip = tons/trip 23.5 0.14 miles/trip

Unmitigated Emission Factor, Ef = [k \* (sL)^0.91 \* (W)^1.02] (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	23.5	23.5	23.5	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m <sup>2</sup> = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)
				_

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

Mitigated Emission Factor, Eext = where p = N =	125	days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2) days per year									
Unmitigated Emission Factor, Ef = Mitigated Emission Factor, Eext =	PM 2.177 1.991	PM10 0.435 0.398	PM2.5 0.1069 0.0977	lb/mile lb/mile							
	Inmitigated	Inmitigated	Unmitigated		Mitigated PTF	Г					

Totals	0.11	0.02	0.01	0.10	0.02	0.00
Vehicle (leaving plant) (one-way trip)	0.06	0.01	0.00	0.05	0.01	0.00
Vehicle (entering plant) (one-way trip)	0.06	0.01	0.00	0.05	0.01	0.00
Process	(tons/yr)	(tons/yr)	(tons/yr)	of PM (tons/yr)	(tons/yr)	(tons/yr)
	PTE of PM	PTE of PM10	PTE of PM2.5	Mitigated PTE	of PM10	of PM2.5
	Unmitigated	Unmitigated	Unmitigated		Mitigated PTE	Mitigated PTE

#### Methodology

Total Weight driven per day (ton/day) Maximum one-way distance (mi/trip) Maximum one-way miles (miles/day) Maximum one-way miles (miles/cady) Average Vehicle Weight Per Trip (ton/trip) Average Miles Per Trip (miles/trip) Unmitigated PTE (tons/yr) Mitigated PTE (tons/yr) Controlled PTE (tons/yr)

#### Abbreviations

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

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

Paint Booth EU003								
Company Name: Globe Industrial LLC/Globe Industries LLC								
Source Address:	335 S. Voyles Road, Pekin, IN 47165							
Permit Number:	F175-35432-00030							
Significant Permit Revision No.:	F175-37411-00030							
Reviewer:	Renee Traivaranon							

Appendix A: Emission Calculations

Equivalent Emission Limitations

#### Calculated using the equation found in 326 IAC 8-1-2(b):

Pursuant to 326 IAC 8-2-9 and 326 IAC 8-1-2(b), when coatings are used in Paint Booth EU003 that do not comply with limitations under 326 IAC 8-2-9, the Paint Booth EU003 VOC emissions shall not exceed the following equivalent emission limitation for extreme performance coatings:

Equivalent Emissions Limit (Extremem Performance Coatings), E =	E = (L) / ((1-(L/D))) 6.674 lbs VOC/gal coating solids	Where:	E =       6.67       Equivalent emission limit in pounds of VOC per gallon of coating solids, as applied.         L =       3.5       Applicable emission limit from this article in pounds of VOC per gallon of coating. (3.5 lb/gal)         D =       7.36       Baseline solvent density of VOC in the coating and shall be equal to seven and thirty-six hundredth (7.36) pounds of VOC per gallon of solvent.
Actual Emissions for Zinc Clad II Ethyl Silicate, Ea =	Ea = (La) / ((1-(La/Da))) 4.69 Ibs VOC/gal coating solids	Where:	Ea =4.69Actual emissions in pounds of VOC per gallon of coating solids, as applied.La =3.83Actual VOC content in pounds of VOC per gallon of coating, as applied.Da =20.8Actual density of the VOC in the coating, as applied, in pounds per gallon of VOC.

Based on the actual VOC content and density of the VOC in the coating specified above, the source is able to comply with the equivalent emissions limit under 326 IAC 8-1-2(b).

Methodology: [Limit (lbs VOC/gal)] = [VOC Content (3.5 lb/gal)] / (1 - ([VOC Content (3.5 lb/gal)] / [Density (7.36 lb/gal)])) [Actual Emissions for Zinc Clad II Ethyl Silicate (lbs VOC/gal)] = [VOC Content (3.83 lb/gal)] / (1 - ([VOC Content (3.83 lb/gal)] / [Density (20.8 lb/gal)]))

Page 11 of 11 TSD App A



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

August 24, 2016

Mr. Houston Andres Globe Industrial, LLC/ Globe Industries, LLC 335 S. Voyles Road Pekin, Indiana 47165

Re: Public Notice

Globe Industrial, LLC/ Globe Industries, LLC Permit Level: FESOP – Significant Permit Revision Permit Number: 175-37411-00030

Dear Mr. Andres:

Enclosed is a copy of your draft FESOP – Significant Permit Revision, 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 Salem Democrat in Salem, Indiana publish the abbreviated version of the public notice no later than August 25, 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 Borden Public Library, 117 W. Main Street in Borden, 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 Renee Traivaranon, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5615 or dial (317) 234-5615.

Sincerely,

Víckí Bíddle

Vicki Biddle Permits Branch Office of Air Quality

> Enclosures PN Applicant Cover letter 2/17/2016







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Michael R. Pence Governor Carol S. Comer Commissioner

#### ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

August 24, 2016

Salem Democrat P. O. Box 506 Salem, Indiana 47167

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Globe Industrial, LLC/ Globe Industries, LLC Washington 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 August 25, 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 – Significant Permit Revision Permit Number: 175-37411-00030

> Enclosure PN Newspaper.dot 2/17/2016







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Michael R. Pence Governor Carol S. Comer Commissioner

August 24, 2016

To: Borden 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:Globe Industrial, LLC/ Globe Industries, LLCPermit Number:175-37411-00030

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

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

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

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

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

> Enclosures PN Library.dot 2/16/2016







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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**

August 24, 2016 Globe Industrial, LLC/ Globe Industries, LLC 175-37411-00030

Dear Concerned Citizen(s):

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

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

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

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

Enclosure PN AAA Cover.dot 2/17/2016



## Mail Code 61-53

IDEM Staff	VBIDDLE 8/24/2	2016		
	Globe Industrial	LC/ Globe Industries LLC 175-374	<u>11-00030 DRAFT</u>	AFFIX STAMP
Name and		Indiana Department of Environmental	Type of Mail:	HERE IF
address of		Management		USED AS
Sender		Office of Air Quality – Permits Branch	CERTIFICATE OF	CERTIFICATE
		100 N. Senate	MAILING ONLY	OF MAILING
		Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
1		Houston Andres Globe Industrial LLC/ Globe Industries LLC 242 S Voyles Rd Pekin IN	47167 (Sou	rce CAATS)							Remarks
2		Shelby Co. Cooperative 2350 E SR 44 Shelbyville IN 46176 (Affected Party)									
3		Roy & Soundra Lemarr 1175 E SR 60 Pekin IN 47165 (Affected Party)									
4		Federal Home Mortgage 5000 Plano Parkway Carrolton TX 75010 (Affected Party)									
5		Hubble & Ruth Potter 1065 S ER 60 Pekin IN 47165 (Affected Party)									
6		Clark County Public Library - Borden Branch 117 Main St Borden IN 47106 (Library)									
7		Washington County Health Department 806 Martinsburg Road, Ste 100 Salem IN 47167 (Health Department)									
8		Washington County Commissioners 99 Public Square Salem IN 47167 (Local Official)									
9		New Pekin Town Council and Town Manager PO Box 310 New Pekin IN 47165 (Local Official)									
10		Jennifer James-Koenig Environmental Compliance Source PO Box 6849 New Albany	N 47151 (C	Consultant)							
11		Ronald & Linda Freed 1142 E 5th Street Pekin IN 47165 (Affected Party)									
12		Gary Cress 20 South Jefferson Street Pekin IN 47165 (Affected Party)									
13		Edward & Benita Lawson 10 S. Jefferson Street Pekin IN 47165 (Affected Party)									
14		Gene & Deloris Lewellyn 207 Voyles Road Pekin IN 47165 (Affected Party)									
15		Orvill & Mary Ann Brough 225 S Voyles Road Pekin IN 47165 (Affected Party)									

Total number of pieces	Total number of Pieces	Postmaster, Per (Name of	The full declaration of value is required on all domestic and international registered mail. The
Listed by Sender	Received at Post Office	Receiving employee)	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 <i>Domestic Mail Manual</i> <b>R900</b> , <b>S913</b> , and <b>S921</b> 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.

Pg 1 of 2

## Mail Code 61-53

IDEM Staff	VBIDDLE 8/24/2	2016		
	Globe Industrial I	LC/ Globe Industries LLC 175-37411	-00030 DRAFT	AFFIX STAMP
Name and	•	Indiana Department of Environmental	Type of Mail:	HERE IF
address of		Management		USED AS
Sender		Office of Air Quality – Permits Branch	CERTIFICATE OF	CERTIFICATE
		100 N. Senate	MAILING ONLY	OF MAILING
		Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Christina Hall 233 S Voyles Road Pekin IN 47165 (Affected Party)		I							Remains
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Total number of pieces	Total number of Pieces	Postmaster, Per (Name of	The full declaration of value is required on all domestic and international registered mail. The
Listed by Sender	Received at Post Office	Receiving employee)	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
1 1			insurance. See <i>Domestic Mail Manual</i> 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.

Pg 2 of 2