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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

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

for White Flyer Targets in Starke County

Significant Permit Revision No.: 149-40483-00027

The Indiana Department of Environmental Management (IDEM) has received an application from White Flyer Targes, located at 317 Kloeckner Drive, Knox, IN 46534, for a significant revision of its FESOP issued on July 10, 2017. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow White Flyer Targes to make certain changes at its existing source. White Flyer Targes requested the correction of the type of the control units controlling the ten (10) paint spray booths, identified as P06a, P06b, P07a, P07b, P016a, P016b, P023a, P023b, P024a, and P024b. In addition, the source requested that nomenclature of some of the emission units to be changed for consistency.

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

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

Starke Couty Public Library
152 W. Culver Road
Knox, Indiana 46534

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
South Bend, IN 46601-1295

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

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

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

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 149-40483-00027 in all correspondence.

Comments should be sent to:

Ghassan Shalabi
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Ghassan Shalabi or (317) 233-7622
Or dial directly: (317) 233-7622
Fax: (317) 232-6749 attn: Ghassan Shalabi
E-mail: gshalabi@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 Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

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

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

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

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Eric J. Holcomb
Governor

DRAFT

Bruno L. Pigott
Commissioner

Mr. Tim Gunter
White Flyer Target
317 Kloeckner Drive
Knox, IN 46534

Re: 149-40483-00027
Significant Revision to
F149-38156-00027

Dear Mr. Gunter:

White Flyer Target was issued a Federally Enforceable State Operating Permit (FESOP) No. F149-38156-00027, on July 10, 2017, for a stationary sporting goods manufacturing operation, located at 317 Kloeckner Drive, Knox, Indiana 46534. On February 2, 2017, the Office of Air Quality (OAQ) received an application from the source requesting the correction of the type of the control units controlling the ten (10) paint spray booths, identified as P06a, P06b, P07a, P07b, P016a, P016b, P023a, P023b, P024a, and P024b. In addition, the source requested that nomenclature of some of the emission units to be changed for consistency. 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).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the Significant Permit Revision into the permit.

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: http://www.in.gov/ai/appfiles/idem-caats/. A copy of the permit is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions regarding this matter, please contact Ghassan Shalabi, 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) 233-7622 or (800) 451-6027, and ask for Ghassan Shalabi or (317) 233-7622.

Sincerely,

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

Attachments: Revised permit and Technical Support Document.

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

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Draft
Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY

White Flyer Targets
317 Kloeckner Drive
Knox, Indiana 46534

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

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

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

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

Operation Permit No.: F149-38156-00027 **Master Agency Interest ID.: 13511**	
Original signed by: Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 10, 2017 Expiration Date: July 10, 2022

Significant Permit Revision No.:149-40483-00027	
Issued by: Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: July 10, 2022

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary sporting goods manufacturing operation.

Source Address:	317 Kloeckner Drive, Knox, Indiana 46534
General Source Phone Number:	574-772-3271
SIC Code:	3949 (Sporting and Athletic Goods, Not Elsewhere Classified)
County Location:	Starke
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rule Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

(a) One (1) natural gas-fired hot oil heater, identified as P08, used by all production lines, constructed in 2005, rated at 2.5 MMBtu per hour;

(b) Two (2) enclosed dry material #1 storage silos and conveyors, identified as P03 and P04, can supply either A or B line, constructed in 2005, each with a storage capacity of 2475 cubic feet and each with a maximum throughput of 26500 tons per year, using two (2) baghouses, identified as BH01 and BH02, respectively, as particulate control, and exhausting to stacks S03, S04 and S05;

(c) One (1) enclosed dry material #1 storage tank, identified as P012, supplies C line, with a storage capacity of 2475 cubic feet, a maximum throughput of 8760 tons per year, constructed in 2013, with emissions vented through a pulse-jet cleaning dust collector and exhausting to stack S10.

(d) One (1) enclosed dry material #2 storage tank, identified as P013, supplies C line, with a storage capacity of 1701 cubic feet, a maximum throughput of 958 tons per year, constructed in 2013, with emissions vented through a pulse-jet cleaning dust collector to stack S11.

(e) One (1) enclosed dry material #3 storage tank, identified as P014, supplies C line, with a storage capacity of 600 cubic feet, a maximum throughput of 9960 tons per year, constructed in 2013, with emissions vented through a pulse-jet cleaning dust collector and exhausting to stack S12.

(f) Two (2) supersack and/or silo enclosed indoor dry material dump stations, identified as P018a and P018b, supplies C line, constructed in 2013, with dust control systems vented to stack S13.

(g) One (1) enclosed dry mixer, identified as P015, supplies C line, with a storage capacity of

1350 gallons, a maximum throughput of 9960 tons per year, constructed in 2013, with the mixed material pneumatically conveyed into a storage hopper, vented to stack S08 and through a baghouse, identified as BH07, and exhausting to stack S13.

(h) One (1) enclosed heated (hot oil heater) liquid storage tank not containing any HAPs or VOCs, identified as P010, supplies C line, with a capacity of 20,000 gallons, a maximum throughput of 32,850 tons per year, constructed in 2013. Emissions are vented through a wet scrubber and filter system to stack S08.

(i) One (1) enclosed heated (from hot oil heater) and agitated mix tank, identified as P011, supplies C line, with a capacity of 1500 gallons, a maximum throughput of 19,710 tons per year, constructed in 2013, with emissions vented through a wet scrubber and filter system to stack 09.

(j) One (1) enclosed heated (from hot oil heater) process tank, identified as P021, supplies C line, with a capacity of 1500 gallons, a maximum throughput of 19,710 tons per year, constructed in 2013, with emissions vented through a wet scrubber and filter system to stack 09.

(k) One (1) heated (from hot oil heater) and agitated Remelt tank, identified as P022, supplies C line, with a capacity of 500 gallons, a maximum throughput of 250 tons per year, constructed in 2013, with wet scrubber and filter system as a control device, vented inside the building.

(l) One (1) pneumatically operated water cooled molding process (C line molding machine), identified as C Line, constructed in 2013, vented inside the building. There are no expected emissions from this process.

(m) Two (2) paint spray booths, identified as P06a and P06b, constructed in 2005, located on A Line turntable #1, each equipped with four (4) air atomized spray guns, with a maximum capacity of 500,000 units per day, using a cyclone and baghouse system (CE06) for particulate control, coating a clay substrate, and exhausting to stack S06;

(n) Two (2) paint spray booths, identified as P07a and P07b, constructed in 2005, located on B Line turntable #1, each equipped with four (4) air atomized spray guns, with a maximum capacity of 500,000 units per day, using a cyclone and baghouse system (CE06) for particulate control, coating a clay substrate, and exhausting to stack S06;

(o) Two (2) paint spray booths, identified as P016a and P016b, located on C line turntable #1, constructed in 2013, each equipped with six (6) air atomized spray guns, with a combined maximum capacity of 600,000 units per day, using a cyclone and baghouse system (CE07) for particulate control, coating a clay substrate, and exhausting to stack S14.

(p) Two (2) paint spray booths, identified as P024a and P024b, previously part of P016a and P016b, constructed in 2013 for construction, located on C line turntable #2, each equipped with six (6) air atomized spray guns, with a combined maximum capacity of 600,000 units per day, using cyclone and baghouse system (CE07) for particulate control, used to coat substrate, and exhausting to stack S14.

(q) Two (2) paint spray booths, identified as P023a and P023b, constructed in 2017, located on A line turntable #2, each equipped with four (4) air atomized spray guns, with a combined maximum capacity of 500,000 units per day, used to paint the bottoms of specialty target, using a cyclone and baghouse system (CE06) for particulate control, and exhausting to stack S06;

(r) Two (2) pitch storage tanks, each with a capacity of 30,000 gallons, identified as P01 and P02, supplies A and B lines, exhausting to stacks S01 and S02, respectively;

(s) Two (2) pitch mix tanks, identified as P05a and P05b, supplies A and B lines, installed in 2005, each with a capacity of 2,000 gallons.

(t) One (1) pitch re-melt tank, identified as P09, supplies A and B lines, installed in 2005, with a capacity of 300 gallons, a maximum throughput of 250 tons per year.

(u) Paved and unpaved roads [326 IAC 6-4].

(v) Two (2) pneumatically operated water cooled molding process, A & B Line, constructed in 2005, vented inside the building.

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

(a) This permit, F149-38156-00027, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

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

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

(1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

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

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

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northern 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
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or

contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

(a) All terms and conditions of permits established prior to F149-38156-00027 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

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

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

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

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

meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

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

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

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

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

Request for renewal shall be submitted to:

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

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

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

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to

326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) Emission Trades [326 IAC 2-8-15(b)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

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

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

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

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

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

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

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

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

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

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

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

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

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

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

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

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

All required notifications shall be submitted to:

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

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

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

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

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

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

no later than ninety (90) days after the date of issuance of this permit.

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

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

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

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

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

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

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

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

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

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

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

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

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

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

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

makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

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

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

(b) The address for report submittal is:

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

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

(d) 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.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(m) Two (2) paint spray booths, identified as P06a and P06b, constructed in 2005, located on A Line turntable #1, each equipped with four (4) air atomized spray guns, with a maximum capacity of 500,000 units per day, using a cyclone and baghouse system (CE06) for particulate control, coating a clay substrate, and exhausting to stack S06;

(n) Two (2) paint spray booths, identified as P07a and P07b, constructed in 2005, located on B Line turntable #1, each equipped with four (4) air atomized spray guns, with a maximum capacity of 500,000 units per day, using a cyclone and baghouse system (CE06) for particulate control, coating a clay substrate, and exhausting to stack S06;

(o) Two (2) paint spray booths, identified as P016a and P016b, located on C line turntable #1, constructed in 2013, each equipped with six (6) air atomized spray guns, with a combined maximum capacity of 600,000 units per day, using a cyclone and baghouse system (CE07) for particulate control, coating a clay substrate, and exhausting to stack S14.

(p) Two (2) paint spray booths, identified as P024a and P024b, previously part of P016a and P016b, constructed in 2013 for construction, located on C line turntable #2, each equipped with six (6) air atomized spray guns, with a combined maximum capacity of 600,000 units per day, using cyclone and baghouse system (CE07) for particulate control, used to coat substrate, and exhausting to stack S14.

(q) Two (2) paint spray booths, identified as P023a and P023b, constructed in 2017, located on A line turntable #2, each equipped with four (4) air atomized spray guns, with a combined maximum capacity of 500,000 units per day, used to paint the bottoms of specialty target, using a cyclone and baghouse system (CE06) for particulate control, and exhausting to stack S06;

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

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

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

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), not applicable, the source shall comply with the following:

(a) The potential to emit PM10 from the ten (10) paint spray booths, identified as P06a, P06b, P07a, P07b, P016a, P016b, P023a, P023b, P024a, and P024b, shall be limited to less than 1.15 pounds per hour.

(b) The potential to emit PM2.5 from the ten (10) paint spray booths, identified as P06a, P06b, P07a, P07b, P016a, P016b, P023a, P023b, P024a, and P024b, shall be limited to less than 1.15 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 year, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable to this source.

D.1.2 Particulate Emission Limitation for Work Practices and Control Technologies [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:

(a) The source shall operate the control device in accordance with manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records shall be maintained for five (5) years.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan, of this permit, contains the Permittee's obligations with regard to the records required by this condition.

Compliance Determination Requirements [326 IAC 2-8-4(9)]

D.1.4 Particulate Control

In order to comply with Condition D.1.2, the dry particulate filter, waterwash, or an equivalent control device for particulate control shall be in operation at all times when the spray booths are in operation.

Compliance Monitoring Requirements

D.1.5 Visible Emissions Notations

(a) Daily visible emission notations of the baghouses exhaust Stacks S06 and S14 shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C - Response to Excursions and 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.

D.1.6 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 paint spray booths. 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.

(c) 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.

The baghouses must operate properly to ensure compliance with 326 IAC 2-8-4 (FSOP).

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

D.1.7 Record Keeping Requirements

(a) To document the compliance status with condition D.1.2, the Permittee shall maintain a record of any actions taken if overspray is visibly detected.

(b) To document the compliance status with Condition D.1.5, the Permittee shall maintain daily records of the visible emission notations of the baghouses exhaust Stacks S06 and S14. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).

(c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) Two (2) enclosed dry material #1 storage silos and conveyors, identified as P03 and P04, can supply either A or B line, constructed in 2005, each with a storage capacity of 2475 cubic feet and each with a maximum throughput of 26500 tons per year, using two (2) baghouses, identified as BH01 and BH02, respectively, as particulate control, and exhausting to stacks S03, S04 and S05;

(c) One (1) enclosed dry material #1 storage tank, identified as P012, supplies C line, with a storage capacity of 2475 cubic feet, a maximum throughput of 8760 tons per year, constructed in 2013, with emissions vented through a pulse-jet cleaning dust collector and exhausting to stack S10.

(e) One (1) enclosed dry material #3 storage tank, identified as P014, supplies C line, with a storage capacity of 600 cubic feet, a maximum throughput of 9960 tons per year, constructed in 2013, with emissions vented through a pulse-jet cleaning dust collector and exhausting to stack S12.

(g) One (1) enclosed dry mixer, identified as P015, supplies C line, with a storage capacity of 1350 gallons, a maximum throughput of 9960 tons per year, constructed in 2013, with the mixed material pneumatically conveyed into a storage hopper, vented to stack S08 and through a baghouse, identified as BH07, and exhausting to stack S13.

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

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

D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

(1) The allowable particulate emission rate from the dry material storage silos, identified as P03 and P04, shall each not exceed 8.61 pounds per hour when operating at a process weight rate of 3.03 tons per hour.

(2) The allowable particulate emission rate from the dry material #1 storage silo, identified as P012, shall each not exceed 4.10 pounds per hour when operating at a process weight rate of 1.00 ton per hour.

(3) The allowable particulate emission rate from the dry material #3 storage silo, identified as P014, shall each not exceed 4.47 pounds per hour when operating at a process weight rate of 1.14 tons per hour.

(4) The allowable particulate emission rate from the dry mixer, identified as P015, shall each not exceed 4.47 pounds per hour when operating at a process weight rate of 1.14 tons per hour.

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

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

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

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 1-6-3]

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

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

D.2.3 Particulate Control

(a) In order to comply with the requirements of Condition D.2.1, the baghouses (P03, P04, and P015) and the dust collectors (P012 and P014) for particulate control shall be in operation and control emissions from the dry material #1 and #3 storage silos and dry mixer, identified as P03, P04, P012, P014 and P015 at all times that the dry material storage silos and the dry mixer 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(1)][326 IAC 2-8-5(a)(1)]

D.2.4 Visible Emission Notations

(a) Daily visible emission notations of the dry material storage silos, identified as P03, P04, P012, P014, and the dry mixer, identified as P015, stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.5 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the dry material storage silos, identified as P03, P04, and the dry mixer, identified as P015 at least once per day when the dry material storage silos and the dry mixer are in operation. If the pressure drop across the baghouse is outside the normal range of 0.5 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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 at least once every six (6) months.

D.2.6 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 silo(s). 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.

(c) 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.

The baghouses must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-6.1 (MSOP).

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

D.2.7 Record Keeping Requirements

(a) To document the compliance status with Conditions D.2.4, the Permittee shall maintain records of daily visible emission notations of the dry material storage silos, identified as P03, P04, P012 and P014, and the dry mixer, identified as P015, stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

(b) To document the compliance status with Condition D.2.5, the Permittee shall maintain daily records of the pressure drop during normal operation. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: White Flyer Targets
Source Address: 317 Kloeckner Drive, Knox, Indiana 46534
FESOP Permit No.: F149-38156-00027

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
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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: White Flyer Targets
Source Address: 317 Kloeckner Drive, Knox, Indiana 46534
FESOP Permit No.: F149-38156-00027

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:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

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

Source Name: White Flyer Targets
Source Address: 317 Kloeckner Drive, Knox, Indiana 46534
FESOP Permit No.: F149-38156-00027

Months: _____ to _____ Year: _____

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

Page 2 of 2

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

Form Completed by:________________________________

Title / Position:____________________________________

Date:____

Phone: ____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	White Flyer Targets
Source Location:	317 Kloeckner Drive, Knox, IN 46534
County:	Starke
SIC Code:	3949 (Sporting and Athletic Goods, Not Elsewhere Classified)
Operation Permit No.:	F149-38156-00027
Operation Permit Issuance Date:	July 10, 2017
Significant Permit Revision No.:	149-40483-00027
Permit Reviewer:	Ghassan shalabi

Existing Approvals

The source was issued FESOP No. F149-38156-00027 on July 10, 2017. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Starke County.

Pollutant	Designations
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.[1]
$PM_{2.5}$	Unclassifiable or attainment effective April 5, 2005, for the annual $PM_{2.5}$ standard.
$PM_{2.5}$	Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard.
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Starke County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) $PM_{2.5}$

Starke 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
Starke 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.

Greenhouse Gas (GHG) Emissions

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

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

Source Status - 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:

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM[1]	PM10[1]	PM2.5[1,2]	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP[3]
Hot Oil Heater	0.02	0.08	0.08	0.01	1.07	0.06	0.90	0.02	0.019 (Hexane)
Material Storage	0.36	0.06	0.02	-	-	-	-	-	-
Mixing and Process	0.12	0.08	0.07	-	-	-	-	-	-
Pitch Tanks	-	-	-	-	-	-	-	-	-
Spray Booths	5.02	5.02	5.02	-	-	19.71	-	0.31	0.31 (Formaldehyde)
Fugitive Emissions (Paved Roads)	0.25	0.05	0.01	-	-	-	-	-	-
Fugitive Emissions (Unpaved Roads)	0.68	0.17	0.02	-	-	-	-	-	-
Total PTE of Entire Source	**6.46**	**5.47**	**5.23**	**0.01**	**1.07**	**19.77**	**0.90**	**0.33**	**0.31**
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

- = negligible
[1]Under the Part 70 Permit program (40 CFR 70), PM_{10} and $PM_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."
[2]$PM_{2.5}$ listed is direct $PM_{2.5}$.
[3]Single highest source-wide HAP.

(a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of 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 unlimited potential to emit HAPs is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

(c) These emissions are based on the TSD of FESOP No.: F149-38156-00027, issued on July 10, 2017.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by White Flyer Targets on September 17, 2018, requesting the correction of the type of the control units controlling the ten (10) paint spray booths, identified as P06a, P06b, P07a, P07b, P016a, P016b, P023a, P023b, P024a, and P024b.

In addition, the source requested that nomenclature of some of the emission units to be changed for consistency.

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 Significant Permit Revision

The unlimited source-wide potential to emit PM10 and PM2.5 is greater than 100 tons per year, each, In FESOP No. 149-38156-00027, issued on July 10, 2017, IDEM OAQ has determined that no numerical PM10 and PM2.5 limits were necessary to limit the paint booths because it was believed that these surface coating operations used dry filter for particulate control at all times when operating in order to comply with the FESOP minor limits. The change of the particulate control from dry filters to cyclone and baghouse system will require the addition of the FESOP minor limits to the permit.

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	146.16
PM_{10}	128.08
$PM_{2.5}$	125.74
SO_2	0.24
NO_x	1.07
VOC	19.77
CO	0.90
Single HAP	0.31
Total HAP	0.33

HAPs	tons/year
Formaldehyde	0.31
Other	0.02
Total	**0.33**

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

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM10 and PM2.5 is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all other criteria pollutants are less than 100 tons per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year.

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.

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM[1]	PM10[1]	PM2.5[1,2]	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP[3]
Hot Oil Heater	0.02	0.08	0.08	0.01	1.07	0.06	0.90	0.02	0.019 (Hexane)
Material Storage	0.36	0.06	0.02	-	-	-	-	-	-
Mixing and Process	0.12	0.08	0.07	-	-	-	-	-	-
Pitch Tanks	-	-	-	-	-	-	-	-	-
Spray Booths	5.02	5.02	5.02	-	-	19.71	-	0.31	0.31 (Formaldehyde)
Fugitive Emissions (Paved Roads)	0.25	0.05	0.01	-	-	-	-	-	-
Fugitive Emissions (Unpaved Roads)	0.68	0.17	0.02	-	-	-	-	-	-
Total PTE of Entire Source	6.46	5.47	5.23	0.01	1.07	19.77	0.90	0.33	0.31
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

- = negligible
[1]Under the Part 70 Permit program (40 CFR 70), PM_{10} and $PM_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."
[2]$PM_{2.5}$ listed is direct $PM_{2.5}$. [3]Single highest source-wide HAP.

(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, and HAPs 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).

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), not applicable, the source shall comply with the following:

(A) The potential to emit PM10 from the ten (10) paint spray booths, identified as P06a, P06b, P07a, P07b, P016a, P016b, P023a, P023b, P024a, and P024b, shall be limited to less than 1.15 pounds per hour.

(B) The potential to emit PM2.5 from the ten (10) paint spray booths, identified as P06a, P06b, P07a, P07b, P016a, P016b, P023a, P023b, P024a, and P024b, shall be limited to less than 1.15 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 year, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable to this source.

(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.

Federal Rule Applicability Determination

Due to this proposed revision, federal rule applicability has been reviewed as follows:

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

National Emission Standards for Hazardous Air Pollutants (NESHAP):
There are no National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included in the permit for this proposed revision.

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 (PSD)
PSD applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.

Compliance Determination and Monitoring Requirements

(a) IDEM does not require any stack testing for any units at this time.

(b) The Compliance Monitoring Requirements applicable to this proposed revision are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Control Equipment #1	Visible Emissions	Daily	Normal-Abnormal	Response Steps

These monitoring conditions are necessary because the cyclone and baghouse systems for the ten (10) paint spray booths, identified as P06a, P06b, P07a, P07b, P016a, P016b, P023a, P023b, P024a, and P024b must operate properly to assure compliance with 326 IAC 2-8-4 (FESOP)

Proposed Changes

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

(1) To incorporate the changes requested by the source, the permit is revised as follows:

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

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

(a) One (1) natural gas-fired hot oil heater, identified as P08, **used by all production lines,** constructed in 2005, rated at 2.5 MMBtu per hour;

(b) Two (2) enclosed dry material #1 storage silos and conveyors, identified as P03 and P04, **can supply either A or B line,** constructed in 2005, each with a storage capacity of 2,475 cubic feet and each with a maximum throughput of 26,500 tons per year, both using baghouses as particulate control, and exhausting to stacks S03, S04 and S05;

(c) One (1) enclosed dry material #1 storage tank, identified as P012, **supplies C line,** with a storage capacity of 2,475 cubic feet, a maximum throughput of 8,760 tons per year, constructed in 2013, with emissions vented through a pulse-jet cleaning dust collector to stack S10.

(d) One (1) enclosed dry material #2 storage tank, identified as P013, **supplies C line,** with a storage capacity of 1701 cubic feet, a maximum throughput of 958 tons per year, constructed in 2013, with emissions vented through a pulse-jet cleaning dust collector to stack S11.

(e) One (1) enclosed dry material #3 storage tank, identified as P014, **supplies C line,** with a storage capacity of 600 cubic feet, a maximum throughput of 9,960 tons per year, constructed in 2013, with emissions vented through a pulse-jet cleaning dust collector to stack S12.

(f) Two (2) supersack and/or silo enclosed indoor dry material dump stations, identified as P018a and P018b, **supplies C line,** constructed in 2013, with dust control systems vented to stack S13.

(g) One (1) enclosed dry mixer, identified as P015, **supplies C line,** with a storage capacity of 1,350 gallons, a maximum throughput of 9,960 tons per year, constructed in 2013, with the mixed material pneumatically conveyed into a storage hopper, vented through a baghouse to stack S13.

(h) One (1) enclosed heated (hot oil heater) liquid storage tank not containing any HAPs or VOCs, identified as P010, **supplies C line,** with a capacity of 20,000 gallons, a maximum throughput of 32,850 tons per year, constructed in 2013. Emissions are vented through a

wet scrubber and filter system to stack S08.

(i) One (1) enclosed heated (from hot oil heater) and agitated mix tank, identified as P011, **supplies C line,** with a capacity of 1500 gallons, a maximum throughput of 19,710 tons per year, constructed in 2013, with emissions vented through a wet scrubber and filter system to stack 09.

(j) One (1) enclosed heated (from hot oil heater) process tank, identified as P021, **supplies C line,** with a capacity of 1500 gallons, a maximum throughput of 19,710 tons per year, constructed in 2013, with emissions vented through a wet scrubber and filter system to stack 09.

(k) One (1) heated (from hot oil heater) and agitated Remelt tank, identified as P022, **supplies C line,** with a capacity of 500 gallons, a maximum throughput of 250 tons per year, constructed in 2013, with wet scrubber and filter system as a control device, vented inside the building.

(l) One (1) pneumatically operated water cooled molding process **(C line molding machine)**, identified as C Line, constructed in 2013, vented inside the building. There are no expected emissions from this process.

(m) Two (2) paint spray booths, identified as P06a and P06b, constructed in 2005, **located on A Line turntable #1,** each equipped with four (4) air atomized spray guns, with a maximum capacity of 500,000 units per day, using ~~dry filters~~ **a cyclone and baghouse system (CE06)** for particulate control, coating a clay substrate, and exhausting to stack S06;

(n) Two (2) paint spray booths, identified as P07a and P07b, constructed in 2005, **located on B Line turntable #1,** each equipped with four (4) air atomized spray guns, with a maximum capacity of 500,000 units per day, using ~~dry filters~~ **a cyclone and baghouse system (CE06)** for particulate control, coating a clay substrate, and exhausting to stack S06;

(o) Two (2) paint spray booths, identified as P016a and P016b, **located on C line turntable #1,** constructed in 2013, each equipped with ~~twelve (12)~~ **six (6)** air atomized spray guns, with a combined maximum capacity of 600,000 units per day, using ~~dry filters~~ **a cyclone and baghouse system (CE07)** for particulate control, coating a clay substrate, and exhausting to stack S14.

(p) Two (2) paint spray booths, identified as P024a and P024b, previously part of P016a and P016b, constructed in 2013 for construction, located on C line turntable #2, each equipped with six (6) air atomized spray guns, with a combined maximum capacity of 600,000 units per day, using cyclone and baghouse system (CE07) for particulate control, used to coat substrate, and exhausting to stack S14.

(~~p~~**q**) Two (2) paint spray booths, identified as P023a and P023b, ~~approved in 2017 for construction~~ **constructed in 2017**, **located on A line turntable #2,** each equipped with four (4) air atomized spray guns, with a combined maximum capacity of 500,000 units per day, used to paint the bottoms of specialty target, using ~~the same dry filters used for the two (2) paint spray booths, identified as P06a and P06b as~~ **a cyclone and baghouse system (CE06) for particulate** control, and exhausting to stack S06;

(~~q~~**r**) Two (2) pitch storage tanks, each with a capacity of 30,000 gallons, identified as P01 and P02, **supplies A and B lines,** exhausting to stacks S01 and S02, respectively;

(~~r~~**s**) Two (2) pitch mix tanks, identified as P05a and P05b, **supplies A and B lines,** installed

in 2005, each with a capacity of 2,000 gallons.

(~~s~~**t**) One (1) pitch re-melt tank, identified as P09, **supplies A and B lines,** installed in 2005, with a capacity of 300 gallons, a maximum throughput of 250 tons per year.

(~~t~~**u**) Paved and unpaved roads [326 IAC 6-4].

(~~u~~**v**) Two (2) pneumatically operated water cooled molding process, A & B Line, constructed in 2005, vented inside the building.

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SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(m) Two (2) paint spray booths, identified as P06a and P06b, constructed in 2005, **located on A Line turntable #1,** each equipped with four (4) air atomized spray guns, with a maximum capacity of 500,000 units per day, using ~~dry filters~~ **a cyclone and baghouse system (CE06)** for particulate control, coating a clay substrate, and exhausting to stack S06;

(n) Two (2) paint spray booths, identified as P07a and P07b, constructed in 2005, **located on B Line turntable #1,** each equipped with four (4) air atomized spray guns, with a maximum capacity of 500,000 units per day, using ~~dry filters~~ **a cyclone and baghouse system (CE06)** for particulate control, coating a clay substrate, and exhausting to stack S06;

(o) Two (2) paint spray booths, identified as P016a and P016b, **located on C line turntable #1,** constructed in 2013, each equipped with ~~twelve (12)~~ **six (6)** air atomized spray guns, with a combined maximum capacity of 600,000 units per day, using ~~dry filters~~ **a cyclone and baghouse system (CE07)** for particulate control, coating a clay substrate, and exhausting to stack S14.

(p) Two (2) paint spray booths, identified as P024a and P024b, previously part of P016a and P016b, constructed in 2013 for construction, located on C line turntable #2, each equipped with six (6) air atomized spray guns, with a combined maximum capacity of 600,000 units per day, using cyclone and baghouse system (CE07) for particulate control, used to coat substrate, and exhausting to stack S14.

(q) Two (2) paint spray booths, identified as P023a and P023b, ~~approved in 2017 for construction~~ **constructed in 2017**, **located on A line turntable #2,** each equipped with four (4) air atomized spray guns, with a combined maximum capacity of 500,000 units per day, used to paint the bottoms of specialty target, using ~~the same dry filters used for the two (2) paint spray booths, identified as P06a and P06b as~~ **a cyclone and baghouse system (CE06) for particulate** control, and exhausting to stack S06;

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

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

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

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), not applicable, the source shall comply with the following:

(a) The potential to emit PM10 from the ten (10) paint spray booths, identified as P06a, P06b, P07a, P07b, P016a, P016b, P023a, P023b, P024a, and P024b, shall be limited to less than 1.15 pounds per hour.

(b) The potential to emit PM2.5 from the ten (10) paint spray booths, identified as P06a, P06b, P07a, P07b, P016a, P016b, P023a, P023b, P024a, and P024b, shall be limited to less than 1.15 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 year, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable to this source.

D.1.~~1~~**2** Particulate Emission Limitation for Work Practices and Control Technologies [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:

(a) The source shall operate the control device in accordance with manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records shall be maintained for five (5) years.

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

A Preventive Maintenance Plan is required for these facilities and their control devices. Section B - Preventive Maintenance Plan, of this permit, contains the Permittee's obligations with regard to the records required by this condition.

Compliance Determination Requirements [326 IAC 2-8-4(9)]

D.1.~~3~~**4** Particulate Control

In order to comply with Condition D.1.~~1~~**2**, the dry particulate filter, waterwash, or an equivalent control device for particulate control shall be in operation at all times when the spray booths are in operation.

Compliance Monitoring Requirements

~~D.1.4 Monitoring~~

~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the eight (8) paint spray booths while one or all of the booths are in operation. The Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C-Response to Excursions or Exceedances, shall be considered a deviation from this permit.~~

~~(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Response to Excursions or Exceedances for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Response to Excursions or Exceedances shall be~~

~~followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a violation of this permit.~~

D.1.5 Visible Emissions Notations

(a) Daily visible emission notations of the baghouses exhaust Stacks S06 and S14 shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C - Response to Excursions and 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.

D.1.6 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 paint spray booths. 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.

(c) 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.

The baghouses must operate properly to ensure compliance with 326 IAC 2-8-4 (FSOP).

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

D.1.4**7** Record Keeping Requirements

(a) To document the compliance status with condition D.1.~~1~~**2**, the Permittee shall maintain a record of any actions taken if overspray is visibly detected.

(b) ~~To document the compliance status with Condition D.1.4 - Monitoring, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspection.~~ **To document the compliance status with Condition D.1.5, the Permittee shall maintain daily records of the visible emission notations of the baghouses exhaust Stacks S06 and S14. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).**

(c) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

****

(2) For additional clarification, IDEM revised the permit as follows:

****

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

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

***

(b) Two (2) enclosed dry material #1 storage silos and conveyors, identified as P03 and P04, **can supply either A or B line,** constructed in 2005, each with a storage capacity of 2475 cubic feet and each with a maximum throughput of 26500 tons per year, ~~both~~ using **two (2)** baghouses**, identified as BH01 and BH02, respectively,** as particulate control, and exhausting to stacks S03, S04 and S05;

(c) One (1) enclosed dry material #1 storage tank, identified as P012, **supplies C line,** with a storage capacity of 2475 cubic feet, a maximum throughput of 8760 tons per year, constructed in 2013, with emissions vented through a pulse-jet cleaning dust collector **and exhausting** to stack S10.

***

(e) One (1) enclosed dry material #3 storage tank, identified as P014, **supplies C line**, with a storage capacity of 600 cubic feet, a maximum throughput of 9960 tons per year, constructed in 2013, with emissions vented through a pulse-jet cleaning dust collector **and exhausting** to stack S12.

***

(g) One (1) enclosed dry mixer, identified as P015, **supplies C line,** with a storage capacity of 1350 gallons, a maximum throughput of 9960 tons per year, constructed in 2013, with the mixed material pneumatically conveyed into a storage hopper, vented to stack S08 and through a baghouse, **identified as BH07, and exhausting** to stack S13.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) Two (2) enclosed dry material #1 storage silos and conveyors, identified as P03 and P04, **can supply either A or B line,** constructed in 2005, each with a storage capacity of 2475 cubic feet and each with a maximum throughput of 26500 tons per year, ~~both~~ using **two (2)** baghouses**, identified as BH01 and BH02, respectively,** as particulate control, and exhausting to stacks S03, S04 and S05;

(c) One (1) enclosed dry material #1 storage tank, identified as P012, **supplies C line,** with a storage capacity of 2475 cubic feet, a maximum throughput of 8760 tons per year, constructed in 2013, with emissions vented through a pulse-jet cleaning dust collector **and exhausting** to stack S10.

(e) One (1) enclosed dry material #3 storage tank, identified as P014, **supplies C line**, with a storage capacity of 600 cubic feet, a maximum throughput of 9960 tons per year, constructed in 2013, with emissions vented through a pulse-jet cleaning dust collector **and exhausting** to stack S12.

(g) One (1) enclosed dry mixer, identified as P015, **supplies C line,** with a storage capacity of 1350 gallons, a maximum throughput of 9960 tons per year, constructed in 2013, with the mixed material pneumatically conveyed into a storage hopper, vented to stack S08 and through a baghouse, **identified as BH07, and exhausting** to stack S13.

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

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

D.2.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

(1) The allowable particulate emission rate from the dry material storage silos, identified as P03 and P04, shall each not exceed 8.61 pounds per hour when operating at a process weight rate of 3.03 tons per hour.

(2) The allowable particulate emission rate from the dry material #1 storage silo, identified as P012, shall each not exceed 4.10 pounds per hour when operating at a process weight rate of 1.00 ton per hour.

(3) The allowable particulate emission rate from the dry material #3 storage silo, identified as P014, shall each not exceed 4.47 pounds per hour when operating at a process weight rate of 1.14 tons per hour.

(4) The allowable particulate emission rate from the dry mixer, identified as P015, shall each not exceed 4.47 pounds per hour when operating at a process weight rate of 1.14 tons per hour.

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

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

$E = 4.10P^{0.67}$ where E = rate of emission in pounds per hour;

and P = process weight rate in tons per hour.

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)] **[326 IAC 1-6-3]**

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

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on September 17, 2018.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 149-40483-00027. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Ghassan Shalabi, 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) 233-7622 or (800) 451-6027, and ask for Ghassan Shalabi or (317) 233-7622.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

TSD Appendix A: Emission Calculations
Emissions Summary

Company Name: White Flyer Targets
Address City IN Zip: 317 Kloeckner Drive, Knox, IN 46534
Permit Number: 149-40483-00027
Reviewer: Ghassan Shalabi
Date: 10/25/2018

	Unlimited Potential to Emit (PTE) (tons/year) (Before Controls)									
Emission Units	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP	
Hot Oil Heater	0.02	0.08	0.08	0.01	1.07	0.06	0.90	0.02	0.02	hexane
Material Storage	17.99	2.91	1.09	0.23	–	–	–	–	–	–
Mixing and Process	26.34	24.28	24.03	–	–	–	–	–	–	–
Pitch Tanks	–	–	–	–	–	1.25E-04	–	–	–	–
Spray Booths	100.50	100.50	100.50	–	–	19.71	–	0.31	0.31	Formaldehyde
Paved Roads	0.28	0.06	0.01	–	–	–	–	–	–	–
Unpaved Roads	1.04	0.26	0.03	–	–	–	–	–	–	–
Total PTE	**146.16**	**128.08**	**125.74**	**0.24**	**1.07**	**19.77**	**0.90**	**0.33**	**0.31**	**Formaldehyde**

	Controlled/Limited Potential to Emit (PTE) (tons/year) (After Controls)									
Emission Units	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP	
Hot Oil Heater	0.02	0.08	0.08	0.01	1.07	0.06	0.90	2.03E-02	0.019	hexane
Material Storage	0.36	0.06	0.02	6.90E-04	–	–	–	–	–	–
Mixing and Process	0.12	0.08	0.07	–	–	–	–	–	–	–
Pitch Tanks	–	–	–	–	–	1.25E-04	–	–	–	–
Spray Booths	5.02	5.02	5.02	–	–	19.71	–	0.31	0.31	Formaldehyde
Paved Roads	0.25	0.05	0.01	–	–	–	–	–	–	–
Unpaved Roads	0.68	0.17	0.02	–	–	–	–	–	–	–
Total PTE	**6.46**	**5.47**	**5.23**	**0.01**	**1.07**	**19.77**	**0.90**	**0.33**	0.31	Formaldehyde

TSD Appendix A: Emission Calculations
Natural Gas Combustion Only
Capacity <100 MMBtu/hr
Unlimited PTE for Existing Significant Boilers

Company Name: White Flyer Targets
Source Address: 317 Kloeckner Ave., Knox, IN 46534
Permit Number: 149-40483-00027
Reviewer: Ghassan Shalabi
Date: 10/25/2018

Unit	Maximum Heat Input Capacity (MMBtu/hr)	High Heat Value (MMBtu/MMscf)	Potential Throughput (MMcf/yr)
Hot Oil Heater	2.50	1020	21.47
Totals	**2.50**		**21.47**

Criteria Pollutants	Pollutant					
Uncontrolled Emission Factor in lb/MMcf	PM* 1.9	PM10/PM2.5* 7.6	SO2 0.6	NOx 100 **see below	VOC 5.5	CO 84
Uncontrolled Potential Emission in tons/yr	0.02	0.08	0.01	1.07	0.06	0.9
Control Efficiency (filterable only)	85.00%	85.00%				
Controlled Emission Factor in lb/MMcf	0.29	5.99				
Potential Emissions (after control) in tons/yr	0.00	0.06				

*PM emission factor is filterable PM only. PM10/PM2.5 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Hazardous Air Pollutants	HAPs - Organics*					HAPs - Metals*				
	Benzene	DCB	Formaldehyd	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.80	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.25E-05	1.29E-05	8.05E-04	0.019	3.65E-05	5.37E-06	1.18E-05	1.50E-05	4.08E-06	2.25E-05

*The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Potential Emission of Total HAPs (tons/yr) **0.0203**

Methodology
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMcf/yr) = [Heat Input Capacity (MMBtu/hr)] * [8,760 hours/year] * [MMcf/1,020 MMBtu]
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Abbreviations
PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
SO2 = Sulfur Dioxide
NOx = Nitrous Oxides
VOC - Volatile Organic Compounds
CO = Carbon Monoxide
DCB = Dichlorobenzene
Pb = Lead
Cd = Cadmium
Cr = Chromium
Mn = Manganese
Ni = Nickel

Appendix A: Emission Calculations
Material Storage Emissions

Company Name: White Flyer Targets
Address City IN Zip: 317 Kloeckner Drive, Knox, IN 46534
Permit Number: 149-40483-00027
Reviewer: Ghassan Shalabi
Date: 10/25/2018

Emission Unit	Maximum Throughput (tons/yr)	Pollutant*	Ef (lb/ton)	Uncontrolled Emissions (ton/yr)	Type of control	Control Efficiency (%)	Controlled Emissions (ton/yr)
Dry Material #1 - P03	26500	PM	0.50	**6.56**	Fabric Filter	98.00%	0.13
		PM10	0.08	**1.06**	Fabric Filter	98.00%	0.02
		PM2.5	0.03	**0.40**	Fabric Filter	98.00%	0.01
Dry Material #1 - P04	26500	PM	0.50	**6.56**	Fabric Filter	98.00%	0.13
		PM10	0.08	**1.06**	Fabric Filter	98.00%	0.02
		PM2.5	0.03	**0.40**	Fabric Filter	98.00%	0.01
Dry Material #1 - P012	8760	PM	0.50	**2.17**	Fabric Filter	98.00%	0.04
		PM10	0.08	**0.35**	Fabric Filter	98.00%	0.01
		PM2.5	0.03	**0.13**	Fabric Filter	98.00%	2.63E-03
Dry Material #2 - P013	958	PM	0.50	**0.24**	Fabric Filter	98.00%	4.74E-03
		PM10	0.08	**0.04**	Fabric Filter	98.00%	7.66E-04
		PM2.5	0.03	**0.01**	Fabric Filter	98.00%	2.87E-04
Dry Material #3 - P014	9960	PM	0.50	**2.47**	Fabric Filter	98.00%	4.93E-02
		PM10	0.08	**0.40**	Fabric Filter	98.00%	7.97E-03
		PM2.5	0.03	**0.15**	Fabric Filter	98.00%	2.99E-03
Heated liquid storage tank P010	32850	Hydrogen sulfide	1.40E-02	**0.23**	wet scrubber and filter	99.70%	6.90E-04

*Assume PM=PM10=PM2.5

Methodology

All storage and conveying is conducted in covered silos and covered conveyors.

These emissions include any emissions that would result from the molding process.

P03 and P04 maximum throughput has remained unchanged from the previous permit.

The controlled emission factors are from AP-42 Ch. 11.19.2-4 (8/04)

The uncontrolled total particulate matter emission factor was calculated from the controlled total particulate matter using the following equation:

Uncontrolled emission factor = Controlled total particulate emission factor (100% - Efficiency %)/ 100%

The conservative emission factor for the heated liquid storage tank assumes all hydrogen sulfide is released from sulfur upon its solidification.

Appendix A: Emission Calculations
Mixing and Process Emissions

Company Name: White Flyer Targets
Address City IN Zip: 317 Kloeckner Drive, Knox, IN 46534
Permit Number: 149-40483-00027
Reviewer: Ghassan Shalabi
Date: 10/25/2018

Emission Unit	Maximum Throughput (tons/yr)	Pollutant*	Ef (lb/ton)	Uncontrolled Emissions (ton/yr)	Type of control	Control Efficiency (%)	Controlled Emissions (ton/yr)
Dry Mixer- P015	9960	PM	0.50	2.47	Fabric Filter	98.00%	4.93E-02
		PM10	0.08	0.40	Fabric Filter	98.00%	7.97E-03
		PM2.5	0.03	0.15	Fabric Filter	98.00%	2.99E-03

*Assume PM=PM10=PM2.5

The controlled emission factors are from AP-42 Ch. 11.19.2-4 (8/04)

All dry storage and conveying is conducted in covered silos and covered conveyors.

The uncontrolled total particulate matter emission factor was calculated from the controlled total particulate matter using the following equation:

Uncontrolled emission factor = Controlled total particulate emission factor (100% - PM10 Efficiency %)/ 100%

Emission Unit Description	Flowrate (acfm) (a)	Estimated Grain Loading (b) (gr/dscf)	Controlled Potential Emissions PM/PM10/PM2.5 (lbs/hr)	Controlled Potential Emissions PM/PM10/PM2.5 (ton/yr)	Control Device % Efficiency	Uncontrolled Emissions PM/PM10/PM2.5 (lbs/hr)	Uncontrolled Emissions PM/PM10/PM2.5 (ton/yr)
Heated liquid storage tank P010	106	0.003	0.003	0.01	99.70%	0.91	3.98
Heated and agitated mix tank P011	106	0.003	0.003	0.01	99.70%	0.91	3.98
Heated process tank P021	106	0.003	0.003	0.01	99.70%	0.91	3.98
Remelt tank P022	106	0.003	0.003	0.01	99.70%	0.91	3.98
Super sack and/or silo dry material dump station P018a	106	0.003	0.003	0.01	99.70%	0.91	3.98
Super sack and/or silo dry material dump station P018b	106	0.003	0.003	0.01	99.70%	0.91	3.98
		Totals	**0.02**	**0.07**		**5.45**	**23.88**

Notes:

a) Values are total airflows for all of the baghouses at an emission source.

b) Grain loading values in the baghouse exhaust, based on manufacturer's data.

c) Assumed that the air exhausted through the stacks is equal to the volume of dry material loaded. Grain loading values are conservative estimates based on engineering judgement.

Methodology:

Controlled Potential Emissions (lbs/hr) = [Grain Loading (gr/dscf)] x [Air Flow (dscfm)] x [60 min/hr] x [lb/7000 grains]

Controlled Potential Emissions (tons/yr) = [Controlled Potential Emissions (lbs/hr)] x [8760 hrs/yr] x [ton/2000 lb]

Uncontrolled Potential Emissions (lbs/hr) = [Controlled Potential Emissions (lbs/hr)] x [1 / 1 - Control Efficiency (%)]

Uncontrolled Potential Emissions (tons/yr) = [Uncontrolled Potential Emissions (lbs/hr)] x [8760 hrs/yr] x [ton/2000 lb]

Appendix A: Emission Calculations
Petroleum Pitch Tank Emissions

Company Name: White Flyer Targets
Address City IN Zip: 317 Kloeckner Drive, Knox, IN 46534
Permit Number: 149-40483-00027
Reviewer: Ghassan Shalabi
Date: 10/25/2018

Tank VOC Emissions - Maximum PTE

Tank ID	Product Stored	Throughput (gallons/yr)	Tank Height (ft)	Diameter (ft)	Vapor Molecular Weight	Vapor Space Outage (ft)	Material Vapor Pressure (psia)	Turnovers per Year	Tank Capacity (gallons)	Breathing Loss (lbs)	Turnover Factor	Working Loss (lbs)	Total VOC Tons/yr
P01	Petroleum Pitch	555,000.00	30	14.5	470	1.10	1.25E-05	19	30,000	0.01	1	0.08	4.50E-05
P02	Petroleum Pitch	555,000.00	30	14.5	470	1.10	1.25E-05	19	30,000	0.01	1	0.08	4.50E-05
P05a	Petroleum Pitch	1,111,000.00	8	6.5	470	1.10	1.25E-05	700	2,000	0.00	1	0.03	1.50E-05
P05b	Petroleum Pitch	1,111,000.00	8	6.5	470	1.10	1.25E-05	700	2,000	0.00	1	0.03	1.50E-05
P09	Petroleum Pitch	50,000.00	5.8	4	470	1.10	1.25E-05	100	500	0.00	1	0.01	5.00E-06
													1.25E-04

Note: Storage tank emissions estimated using EPA software Tanks 4.09

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

Company Name: White Flyer Targets
Address City IN Zip: 317 Kloeckner Drive, Knox, IN 46534
Permit Number: 149-40483-00027
Reviewer: Ghassan Shalabi
Date: 10/25/2018

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

Vehicle Information (provided by source)

Type of Traffic	Vehicle Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight of Loaded Vehicle (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle Type 1 (entering plant) (one-way trip)	Box Trailer & Tractor	15.0	1.0	15.0	17.5	262.5	100	0.019	0.3	103.7
Vehicle Type 1 (leaving plant) (one-way trip)	Box Trailer & Tractor	15.0	1.0	15.0	40.0	600.0	100	0.019	0.3	103.7
			Total	**30.0**		**862.5**			**0.6**	**207.4**

Average Vehicle Weight Per Trip = 28.8 tons/trip
Average Miles Per Trip = 0.02 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 =	28.8	28.8	28.8	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m^2 = 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 = Ef * [1 - (p/4N)]
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	2.674	0.535	0.1313	lb/mile
Mitigated Emission Factor, Eext =	2.445	0.489	0.1200	lb/mile

Type of Traffic	Vehicle Type	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle Type 1 (entering plant) (one-way trip)	Box Trailer & Tractor	0.14	0.03	0.01	0.13	0.03	0.01
Vehicle Type 1 (leaving plant) (one-way trip)	Box Trailer & Tractor	0.14	0.03	0.01	0.13	0.03	0.01
		0.28	**0.06**	**0.01**	**0.25**	**0.05**	**0.01**

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

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

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

Company Name: White Flyer Targets
Address City IN Zip: 317 Kloeckner Drive, Knox, IN 46534
Permit Number: 149-40483-00027
Reviewer: Ghassan Shalabi
Date: 10/25/2018

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

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	7.0	1.0	7.0	40.0	280.0	300	0.057	0.4	145.2
Vehicle (leaving plant) (one-way trip)	7.0	1.0	7.0	17.5	122.5	300	0.057	0.4	145.2
		Totals	**14.0**		**402.5**			**0.8**	**290.3**

Average Vehicle Weight Per Trip = 28.8 tons/trip
Average Miles Per Trip = 0.06 miles/trip

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

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	28.8	28.8	28.8	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = E * [(365 - P)/365] (Equation 2 from AP-42 13.2.2)
Mitigated Emission Factor, Eext = E * [(365 - P)/365]
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	7.13	1.82	0.18	lb/mile
Mitigated Emission Factor, Eext =	4.69	1.20	0.12	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	0.52	0.13	0.01	0.34	0.09	0.01
Vehicle (leaving plant) (one-way trip)	0.52	0.13	0.01	0.34	0.09	0.01
Totals	**1.04**	**0.26**	**0.03**	**0.68**	**0.17**	**0.02**

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

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

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: White Flyer Targets
Address City IN Zip: 317 Kloeckner Drive, Knox, IN 46534
Permit Number: 149-40483-00027
Reviewer: Ghassan Shalabi
Date: 10/25/2018

Material = Target Paint	Density (Lb/Gal)	Gallons of Material	Weight % Formaldehyde	Propylene Oxide	Formaldehyde Emissions (ton/yr)
128-1562 Orange	11.2	150.0	0.10%	NA	0.31
1564 Black	11.0	150.0	NA	1ppm	Negligible

Total Potential Emissions	Total HAPs	**0.31**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Emission Units P06a, P06b, P07a, P07b, P016a, P016b, P023a, P023b, P024a, and P024b

Company Name: White Flyer Targets
Address City IN Zip: 317 Kloeckner Drive, Knox, IN 46534
Permit Number: 149-40483-00027
Reviewer: Ghassan Shalabi
Date: 10/25/2018

Emissions with 98% Control Efficiency

Line	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Maximum Gallons (coating/day)	Pounds VOC per gallon of coating	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency	Control Efficiency
A (white)	12.2	68.81%	150.0	0.31	46.50	8.49	26.13	75%	98%
A (flurescent)	11.0	47.75%	150.0	0.00	0.00	0.00	39.33	75%	98%
B (white)	12.2	68.81%	150.0	0.31	46.50	8.49	26.13	75%	98%
C (Black)	11.2	76.84%	75.0	0.20	15.00	2.74	8.90	75%	98%

	VOC	PM
Total Uncontrolled PTE	**19.71**	**100.50**
Controlled Emissions (tons/yr) at 98% Control Efficiency:	**NA**	**2.01**

Emissions with 95% Control Efficiency

Line	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Maximum Gallons (coating/day)	Pounds VOC per gallon of coating	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency	Control Efficiency
A (white)	12.2	68.81%	150.0	0.31	46.50	8.49	26.13	75%	95%
A (flurescent)	11.0	47.75%	150.0	0.00	0.00	0.00	39.33	75%	95%
B (white)	12.2	68.81%	150.0	0.31	46.50	8.49	26.13	75%	95%
C (Black)	11.2	76.84%	75.0	0.20	15.00	2.74	8.90	75%	95%

	VOC	PM			
Total Uncontrolled PTE	**19.71**	**100.50**			
Controlled Emissions (tons/yr) at 95% Control Efficiency:	**NA**	**5.02**	tpy	**1.15**	lb/hr

Note: The pollutants represent the worst case scenerio for each line.

Methodology

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

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

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

TSD Appendix A: Emission Calculations
326 IAC 6-3-2 Compliance Summary

Company Name: White Flyer Targets
Source Address: 317 Kloeckner Drive, Knox, IN 46534
Permit Number: 149-40483-00027
Reviewer: Ghassan Shalabi
Date: 10/25/2018

	Maximum Process Weight (lbs/hour)	Maximum Process Weight (tons/hour)	326 IAC 6-3 Allowable Particulate Emission Rate (lbs/hr) for each unit of that type	Uncontrolled PM Emission factor (lb/ton)	Uncontrolled PTE of PM (lbs/hr)	Is a Control Device Needed to Comply with 326 IAC 6-3-2?
Dry Material #1 - P03	6050.23	3.03	8.61	4.95	14.97	Yes
Dry Material #1 - P04	6050.23	3.03	8.61	4.95	14.97	Yes
Dry Material #1 - P012	2000.00	1.00	4.10	4.95	4.95	Yes
Dry Material #3 - P014	2273.97	1.14	4.47	4.95	5.63	Yes
Dry Mixer- P015	2273.97	1.14	4.47	4.95	5.63	Yes

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

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

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

The controlled emission factors are from AP-42 Ch. 11.19.2-4 (8/04)
The uncontrolled total particulate matter emission factor was calculated from the controlled total particulate matter using the following equation:
Uncontrolled emission factor = Controlled total particulate emission factor (100% - Efficiency %)/ 100%

Methodology
This tab includes emission units that have uncontrolled PTE greater than 0.551 lbs/hr
Maximum Process Weight (lbs/hr) are from the Material Storage and the Mixing and Process tabs Maximum Throughput (lbs/hr)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

December 6, 2018

Tim Gunter
White Flyer Targets
317 Kloeckner Dr.
Knox, IN 46534

Re: Public Notice
White Flyer Targets
Permit Level: FESOP Sig Permit Rev Minor PSD
Permit Number: 149-40483-00027

Dear Mr. Gunter:

Enclosed is a copy of your draft FESOP Significant Permit Revision Minor PSD, 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 Leader in Knox, IN publish the abbreviated version of the public notice no later than December 14, 2018. 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 Starke County Public Library, 152 West Culver Road in Knox, IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Ghassan Shalabi, 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 3-7622 or dial (317) 233-7622.

Sincerely,

Theresa Weaver

Theresa Weaver
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 1/9/2017

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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

December 6, 2018

The Leader
P.O. Box 38
Knox, Indiana 46534

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for White Flyer Targets, Starke 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 December 14, 2018.

Please send the invoice, notarized form, clippings showing the date of publication to Bo Liu, at the Indiana Department of Environmental Management, Accounting, Room N1340, 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 Theresa Weaver at 800-451-6027 and ask for extension 4-5256 or dial 317-234-5256.

Sincerely,

Theresa Weaver

Theresa Weaver
Permit Branch
Office of Air Quality

Permit Level: FESOP Significant Permit Revision Minor PSD
Permit Number: 149-40483-00027

Enclosure

PN Newspaper Letter 8/22/2018

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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December 6, 2018

To: Starke County Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: White Flyer Targets
Permit Number: 149-40483-00027

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 1/9/2017

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

December 6, 2018
White Flyer Targets
149-40483-00027

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 Letter 1/9/2017

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

December 6, 2018

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

Permit Number: **149-40483-00027**
Applicant Name: **White Flyer Targets**
Location: **Knox, Starke County, Indiana**

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:
http://www.in.gov/ai/appfiles/idem-caats/

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

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

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

Mail Code 61-53

IDEM Staff	TAWEAVER 12/6/2018 White Flyer Targets 149-40483-00027 (draft)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	▶	Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: **CERTIFICATE OF MAILING ONLY**

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee Remarks
1		Tim Gunter White Flyer Targets 317 Kloeckner Dr Knox IN 46534 (Source CAATS)									
2		Robert Dritschel Director White Flyer Targets 115 US Hwy 202 Ringoes NJ 08551 *(RO CAATS)*									
3		Starke County Health Department Courthouse, 1st Floor, Main St Knox IN 46534-1148 *(Health Department)*									
4		Starke County Board of Commissioners 53 E. Mound Knox IN 46534 *(Local Official)*									
5		Starke County Public Library 152 West Culver Road Knox IN 46534 *(Library)*									
6		Knox City Council and Mayors Office 101 W Washington Street Knox IN 46534 *(Local Official)*									
7		Mr. Brian Skeuse Regent Chemical Research 115 US Hwy 202 Ringoes NJ 08551 *(Source - addl contact)*									
8		Jeff Mayes News-Dispatch 422 Franklin St Michigan City IN 46360 *(Affected Party)*									
9		Christina Seiler The Rochester Sentinel PO Box 260 Rochester IN 46975 *(Affected Party)*									
10											
11											
12											
13											
14											
15											

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

FACSIMILIE OF PS Form 3877