

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OFFICE OF AIR MANAGEMENT

and

INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION

Hughes Technical Services Company - Indianapolis
6125 E. 21st Street (Mail Stop 4)
Indianapolis, Indiana 46219-2058

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

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 and 326 IAC 2-1-3.2, 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 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F097-5444-00100	
Issued by: Dr. Robert Holm, Administrator	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information presented in the permit application and any information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and Environmental Resources Management Division (ERMD) and submitted to IDEM, OAM and ERMD.

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

The Permittee owns and operates a stationary source for the manufacturing of Avionic Equipment.

Responsible Official: Charles D. Jones
Source Address: 6125 E. 21st Street (Mail Stop 4) Indianapolis, Indiana, 46219-2058
Mailing Address: 6125 E. 21st Street (Mail Stop 4) Indianapolis, Indiana, 46219-2058
SIC Code: 3662
County Location: Marion
County Status: Nonattainment for TSP
Source Status: Synthetic Minor Source, FESOP Program
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD or Emission Offset Rules;

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) Three 20.25 MMBtu per hour Nebraska boilers, identified as emission units 1, 2 and 3. Each boiler is fired with either natural gas or distillate oil. Each of the three (3) boilers were constructed after June 9, 1989. Emissions are exhausted to a separate stack for each boiler and are identified as stack vents S₁, S₂ and S₃.
- b) The Production Paint Booths 1-4, identified as emission unit 4 through 7 and the Aircraft Armament Equipment Paint Shop, identified as emission unit 8.
 - 1) The Production Paint Booth 1, emission unit 4, is each equipped with one atomized airless spray gun and a dry filter to control particulate emissions from over spray. Production Paint Booth 1 is used to coat avionics equipment. This booth was constructed in 1987. Emissions from Production Paint booths 1 is vented out stacks identified as stack/vent S₄.
 - 2) The Production Paint Booth 2, emissions unit 5, is each equipped with one atomized airless spray gun and a dry filter to control particulate emissions from over spray. Production Paint Booth 2 is used to coat avionics equipment. This booth was constructed in 1987. Emissions from Production Paint booths 1 is vented out stacks identified as stack/vent S₅.
 - 3) The Production Paint Booth 3, emission unit 6, is each equipped with one atomized airless spray gun and a dry filter to control particulate emissions from over spray. Production Paint Booth 3 is used to coat avionics equipment. This booth was constructed in 1987. Emissions from Production Paint booths 1 is vented out stacks identified as stack/vent S₆.
 - 4) The Production Paint Booth 4, emission unit 7, is each equipped with one atomized airless spray gun and a dry filter to control particulate emissions from over spray. Production Paint Booth 4 is used to coat avionics equipment. This booth was constructed in 1987. Emissions from Production Paint booths 1 is

- vented out stacks identified as stack/vent S₇.
- 5) The Aircraft Armament Equipment Paint Shop, emission unit 8, is equipped with an airless atomized sprayer with a dry filter to control over spray. This paint booth is used to coat avionics equipment. This booth was installed in 1995. Emission are vented out one stack identified as Stack vent S₈
- c) Deburring operation, identified as emission unit 9. This facility was installed in 1982. The particulate emissions from this unit are controlled by a venturi scrubber which exhausts out one stack identified as S₉.

A.3 Insignificant Activities [326 IAC 2-7-1(20)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- a) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- b) A petroleum fuel, other than gasoline dispensing facility, having a storage capacity of less than or equal to 10500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- c) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
- d) Machining where an aqueous cutting coolant continuously floods the machining interface.
- e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6
- f) Cleaners and solvents characterized as follows:
- 1) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100 F) or;
 - 2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 C (68 F);
- the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- g) The following equipment related to manufacturing activities not resulting in emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- h) Activities associated with the treatment of waste streams with an oil and grease content less than or equal to 1% by volume.
- i) Forced and induced draft cooling tower systems not regulated under a NESHAP
- k) Paved and unpaved roads and parking lots with public access
- l) Asbestos abatement projects regulated by 326 IAC 14-10
- m) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- n) Blowdown for any of the following: sight glass; boiler; compressors; pumps and cooling towers.
- o) Furnaces used for melting metals other than beryllium with a brim full capacity of less than or equal to 450 cubic inches by volume.
- p) Emergency generators as follows:
Diesel generators not exceeding 1600 horse power.
- q) A laboratory as defined in 326 IAC 2-7-1(20)(C)

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 Environmental Resource Management Division (ERMD), Air Quality

Management Section (AQMS) and Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions Superseded [326 IAC 2]

This permit supersedes the operating conditions of all construction and operating permits issued to this stationary source under 326 IAC 2 prior to the effective date of this FESOP.

SECTION B GENERAL CONDITIONS

B.1 General Requirements [IC 13-15] [IC 13-17] (Prior to July 1, 1996: IC 13-7 and IC 13-1-1)

The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.

B.2 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, any applicable definitions found in IC 13-11 (prior to July 1, 1996, IC 13-7-1, IC 13-1-1-2), 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and ERMD.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
- (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by ERMD.

B.5 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 2-8-7.

B.6 Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]

- (a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
- (b) Indiana 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.

B.7 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.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Ave.
Indianapolis Indiana 46221

- (b) The Permittee shall furnish to IDEM, OAM, and ERMD within a reasonable time, any information that IDEM, OAM, and ERMD 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.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and ERMD copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to the U.S. EPA and IDEM, OAM, and ERMD along with a claim of confidentiality.

Such confidentiality claims shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM and ERMD).

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

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

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) 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.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(I)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) This certification shall be submitted on the attached Certification Form.

- (c) A responsible official is defined at 326 IAC 2-7-1(33).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually certify that this source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Ave.
Indianapolis Indiana 46221

- (b) This annual compliance certification report required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, and ERMD on or before the date it is due. [326 IAC 2-5-3]
- (c) The annual compliance certification report shall include the following:
- (1) The 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).
 - (5) Such other facts as IDEM, OAM, and ERMD may require to determine the compliance status of the source, as specified in Sections D of this permit.
- (d) The Permittee shall also annually certify that this source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.

B.13 Preventive Maintenance Plan [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)] [326 IAC 1-6-3]

- (a) The Permittee shall prepare, maintain and implement Preventive Maintenance Plans within ninety (90) days after the issuance of this permit, including the following information on each:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

- (3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;
 - (4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
 - (5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- (b) Preventive Maintenance Plans shall be submitted to IDEM, OAM and ERMD, upon request and shall be subject to review and approval by IDEM, OAM and ERMD.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes 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 of this permit;
 - (4) For each emergency lasting longer than one (1) hour, the Permittee notified IDEM, OAM and ERMD, within four (4) daytime business hours by telephone or facsimile after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

ERMD

Telephone No.: 317-327-2234 (ask for Compliance Section)
Facsimile No.: 317-327-2274

Failure to notify IDEM, OAM and ERMD, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting longer than one (1) hour, the Permittee submitted written notice or facsimile of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Ave.
Indianapolis Indiana 46221

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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (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 any emergency or upset provision contained in 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAM and ERMD, 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, OAM and ERMD, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, 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 326 IAC 2-8-12(g)(2)(B).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any corrective actions or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Ave.
Indianapolis Indiana 46221

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) Written notification shall be submitted on the attached Deviation Occurrence Reporting Form(s) or their substantial equivalent.

B.16 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 FESOP 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)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 (prior to July 1, 1996, in IC 13-7-10-5) or if IDEM, OAM and ERMD 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, OAM and ERMD, 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, OAM and ERMD, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM and ERMD, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 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, OAM and ERMD and shall include, at minimum, 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(20).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Ave.
Indianapolis Indiana 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) Delivered by any method and received and stamped by IDEM, OAM and ERMD, on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM and ERMD upon receiving a timely and complete 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.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
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, OAM and ERMD 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 in writing by IDEM, OAM and ERMD, any additional information identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- (b) An administrative permit amendment may be made by IDEM, OAM and ERMD, consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A minor modification is any revision to this permit that cannot be accomplished under administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor permit modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM and ERMD takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.

- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(I) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.23 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under 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
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Ave.
Indianapolis Indiana 46221

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

- (b) For each such change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

- (c) Emission Trades [326 IAC 2-8-15(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable State Implementation Plan (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(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7) and subject to the constraints in Section (a) of this condition and those in 326 IAC 2-8-15(d).
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.24 Construction Permit Requirement [326 IAC 2]

Modification, construction, or reconstruction shall be permitted as required by and in accordance with 326 IAC 2.

B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM and ERMD, 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) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. Use of photographic equipment is subject to Hughes Technical Services security measures. [326 IAC 2-8-5(a)(4)]

B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and ERMD, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner.
- (c) IDEM, OAM and ERMD shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM and ERMD, consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.
- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM and ERMD or in a time period that is consistent with the payment schedule issued by IDEM, OAM and ERMD.
- (d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-5674 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 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 from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;
 - (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 three hundred sixty-five (365) consecutive day 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 three hundred sixty-five (365) consecutive day period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20). 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.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.3 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.

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

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2(3).

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)].

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

- (a) All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B - Preventive Maintenance Plan.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation.
- (c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.

C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector must be Indiana accredited is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-2.1]

All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), utilizing methods approved by the department.

The test protocol shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Ave.
Indianapolis Indiana 46221

no later than thirty-five (35) days before the intended test date.[326 IAC 3-2.1-2(a)]

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

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented in accordance with the provisions

of 326 IAC 2-8-4(3). The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Ave.
Indianapolis Indiana 46221

in writing no more than ninety (90) days after receipt of this permit, with full justification of the reasons for inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(33).

C.10 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) The Permittee shall perform all necessary maintenance and make all necessary and reasonable attempts to keep all required monitoring equipment in proper operating condition at all times.
- (b) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (c) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment.
- (d) Preventive Maintenance Plans of the monitors shall be implemented. In addition, prompt correction, shall be initiated whenever indicated.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, whenever applicable according to the provisions of 326 IAC 3, or 40 CFR 60, Appendix A, as appropriate, unless some other method is specified in this permit.

C.12 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

- (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) Written notification is to be 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
 - (3) Waste disposal site.
- (c) The Permittee shall postmark or deliver the notice 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
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46204-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Ave.
Indianapolis Indiana 46221

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) **Indiana Accredited 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 thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance is present in more than a threshold quantity that is subject to 40 CFR 68:

- (a) 40 CFR 68 is an applicable requirement;
- (b) The Permittee shall submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), a certification statement that the source is in compliance with all the requirement of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM and ERMD that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (c) Provide annual certification to IDEM, OAM and ERMD that the Risk Management is being properly implemented.

C.14 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) The Preventive Maintenance Plan described in Section B, Preventive Maintenance Plan, of this permit.
- (b) For each compliance monitoring condition of this permit appropriate corrective actions, as described in the Preventive Maintenance Plan, shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the corrective actions within the prescribed time contained within the Preventive Maintenance Plan shall constitute a violation of the permit unless taking the corrective action set forth in the Preventive Maintenance Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee may be excused from

taking further corrective action for any of the following reasons:

- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further corrective actions providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.
- (d) Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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, appropriate corrective actions shall be taken. A description of these corrective actions shall be submitted to IDEM, OAM and ERMD within thirty (30) days of receipt of the test results. These corrective actions shall be implemented immediately unless notified by IDEM, OAM and ERMD that they are not acceptable. The Permittee shall make every effort to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM and ERMD reserves the right to utilize enforcement activities to resolve the non-compliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

C.16 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Ave.
Indianapolis Indiana 46221

- (b) This annual emission statement required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, and ERMD on or before the date it is due. [326 IAC 2-5-3]

C.17 Monitoring Data Availability

- (a) All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) When the equipment listed in Section D is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM and ERMD representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;

- (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to: work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- and
- Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Ave.
Indianapolis Indiana 46221
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM, and ERMD on or before the date it is due. [326 IAC 2-5-3]
 - (c) Unless otherwise specified in this permit any semi-annual report shall be submitted within thirty (30) days of the end of the six (6) month reporting period.
 - (d) All instances of deviations from any requirements of this permit must be clearly identified in such reports;
 - (e) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be

clearly identified in such reports.

- (f) The first report shall cover the period commencing the date of issuance of this permit and ending December 30, 1997.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 [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 the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

- a) Three 20.25 MMBtu per hour Nebraska Boilers, identified as emission units 1, 2 and 3. Each boiler is capable of being fired with either natural gas or distillate oil. Emissions from each boiler are exhausted to a separate stack identified as stack vents S₁, S₂ and S₃. Each of the three (3) boilers were constructed in 1989.

Emissions Standards [326 IAC 2-8-4(1)]

D.1.1 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 12-1][326 IAC 2-8]

- a) The sulfur content of fuel oil combusted in the three 20.25 million Btu per hour Nebraska Boilers (emissions units 1, 2 and 3) shall not exceed 0.49 percent by weight. This limitation on the sulfur content of fuel oils combusted satisfies the requirement of 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations), and 40 CFR 60.42c (d) (Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units).
- b) The Permittee is limited to burning no more than 2,588.44 thousand gallons of fuel oil , in the three 20.25 million Btu per hour Nebraska Boilers (emissions unit 1, 2 and 3). This fuel usage restriction is equivalent to a source wide sulfur dioxide emissions limitation of 91 tons per twelve consecutive month period such that 326 IAC 2-7 (Part 70 Permit Program) shall not apply.

D.1.2 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitation for Sources of Indirect Heating), Particulate Matter (PM) emissions for each of the three 20.25 MMBtu per hour Nebraska Boilers (emissions units 1, 2 and 3) shall not exceed 0.37 pounds of PM per million Btu heat input.

This limitation is based on the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

where P_t = Pound of PM emitted per million Btu of heat input

Q = The total source maximum heat input capacity in million Btu per hour. Q is equivalent to 60.75 MMBtu/hr

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the three 20.25 MMBtu per hour Nebraska Boilers.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(1)]

Compliance with the particulate emissions limitation in condition D.1.2 shall be determined based

on stack testing. Testing of these facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4.

D.1.5 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, and 326 IAC 3-3-4, the Permittee shall demonstrate compliance with limitations in conditions D.1.1(a) utilizing one of the following options:

- (1) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
- (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

A determination of noncompliance pursuant to either of the methods specified in (1) or (2) above shall not be refuted by evidence of compliance pursuant to the other method. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

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

D.1.6 Visible Emissions Notations

- (a) Daily visible emission notations shall be performed during normal daylight operations when combusting fuel oil in any one of the three 20.25 million Btu per hour Nebraska Boilers (emission units 1, 2 and 3). 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) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

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

D.1.7 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1(a), the Permittee shall maintain records in accordance with (1) through (6) below.
 - (1) Calendar dates covered in the compliance determination period;

- (2) Actual usage since last compliance determination period and value calculated per limitation;
- (3) Fuel supplier certifications or the results of fuel oil analysis, and
- (4) A certification, signed by the owner or operator, that the records of the fuel supplier certifications or results of fuel oil analysis represent all of the distillate or residual fuel combusted during the period.

The fuel supplier certification shall contain, as a minimum, the following:

- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.1(b), the Permittee shall maintain records of the monthly sum of fuel oil combusted in the (3) three 20.25 million Btu per hour Nebraska boilers (emission units 1, 2 and 3).
- (c) To document compliance with Condition D.1.6, the Permittee shall maintain records of the visible emissions notations, and those additional inspections prescribed by the Preventative Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A semi-annual summary of the information necessary to document compliance with Condition D.1.1(a) and (b) shall be submitted to the addresses listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the semi-annual period being reported.

In addition to the above, the Permittee shall certify on the form provided, that natural gas was the fired in the boiler at all times during the reporting period. Alternatively the Permittee shall report the number of days during which an alternative fuel was burned during the reporting period.

SECTION D.2 FACILITY OPERATION CONDITIONS

- b) The Production Paint Booths 1-4, identified as emission unit 4 through 7 and the Aircraft Armament Equipment Paint Shop, identified as emission unit 8.
- 1) The Production Paint Booth 1, emission unit 4, is each equipped with one atomized airless spray gun and a dry filter to control particulate emissions from over spray. Production Paint Booth 1 is used to coat avionics equipment. This booth was constructed in 1987. Emissions from Production Paint booths 1 is vented out stacks identified as stack/vent S₄.
 - 2) The Production Paint Booth 2, emissions unit 5, is each equipped with one atomized airless spray gun and a dry filter to control particulate emissions from over spray. Production Paint Booth 2 is used to coat avionics equipment. This booth was constructed in 1987. Emissions from Production Paint booths 1 is vented out stacks identified as stack/vent S₅.
 - 3) The Production Paint Booth 3, emission unit 6, is each equipped with one atomized airless spray gun and a dry filter to control particulate emissions from over spray. Production Paint Booth 3 is used to coat avionics equipment. This booth was constructed in 1987. Emissions from Production Paint booths 1 is vented out stacks identified as stack/vent S₆.
 - 4) The Production Paint Booth 4, emission unit 7, is each equipped with one atomized airless spray gun and a dry filter to control particulate emissions from over spray. Production Paint Booth 4 is used to coat avionics equipment. This booth was constructed in 1987. Emissions from Production Paint booths 1 is vented out stacks identified as stack/vent S₇.
 - 5) The Aircraft Armament Equipment Paint Shop, emission unit 8, is equipped with an airless atomized sprayer with a dry filter to control over spray. This paint booth is used to coat avionics equipment. This booth was installed in 1995. Emission are vented out one stack identified as Stack vent S₈.

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

D.2.1 Volatile Organic Compound

The VOC emissions from each paint booth, emission units 4, 5, 6, 7, and 8, are limited to less than fifteen (15) pounds per day each, such that the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) shall not apply.

D.2.2 Particulate Matter (PM) Overspray

The PM overspray from paint booths, emission units 4, 5, 6, 7, and 8, shall not exceed the pounds per hour emission rate established as E in the following formula:

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

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

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for emission units 4, 5, 6, 7, and 8 and its control device.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-8-5(1)]

Compliance with the PM emission limitations established in condition D.1.2 shall be determined based on stack testing. Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4.

D.2.5 Particulate Matter (PM) Over Spray

The dry filters used to control particulate matter overspray shall be in operation at all times when the paint booths, emission units 4, 5, 6, 7, and 8, are in operation.

D.2.6 Volatile Organic Compounds

Compliance with the VOC emissions limitations contained in Condition D.2.1 shall be determined based on the daily calculated VOC emissions rate. The daily VOC emissions rate shall be calculated based on the daily pounds of solvents and coatings used and the VOC content of coatings and solvents used.

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

D.2.7 Monitoring

- (a) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of over spray on the nearby ground.
- (c) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an over spray emission, evidence of over spray emission, or other abnormal emission is observed.
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained shall be taken daily. All records shall be complete and sufficient to establish compliance with the VOC emission limits established condition D.2.1.
 - (1) The amount and VOC content of each coating material and solvent used.

Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

- (2) A log of the dates of use;
 - (3) The cleanup solvent usage;
 - (4) The total VOC usage; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain a log of weekly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Quarterly Reporting

A quarterly summary of the information necessary to document compliance with Condition D.2.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

- c) Deburring operation, is identified as emission unit 9. The particulate emissions from this unit are controlled by a venturi scrubber which exhausts out one stack identified as S₉. The deburring operation was installed in 1982.

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

D.3.1 Particulate Matter

The venturi scrubber shall be in operation at all times when the deburring process is in operation. The particulate matter emissions from this facility shall not exceed 0.55 pounds per hour pursuant to 326 IAC 6-3-2(c).

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

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

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

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.3 Testing Requirements [326 IAC 2-8-5(1)]

Compliance with the PM emission limitations established in condition D.1.2 shall be determined based on stack testing. Testing of this facility is not specifically required by this permit. However, this does not preclude testing requirements on this facility under 326 IAC 2-1-4(f) and 326 IAC 2-8-4.

D.3.4 Particulate Matter (PM) Emissions

The venturi scrubber shall be in operation at all times when the deburring facility is in operation.

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

D.3.5 Visible Emission Notations

- (a) Weekly visible emission notations shall be performed during normal daylight operations when the deburring facility is in operation. 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) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

Record Keeping Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.3.6 Record Keeping Requirements

- (a) To document compliance with Condition D.3.5, the Permittee shall maintain a log of weekly visible emissions notations, and those additional inspections prescribed by the Preventative Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Insignificant Activities:

Cold Degreasing Operations that do not exceed 145 gallons usage per 12 months.

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

D.4.1 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.

- (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

State Form 47738 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY CONTROL SECTION, DATA COMPLIANCE**

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

Source Name: Hughes Technical Services Company - Indianapolis
Source Address: 6125 E. 21st Street, Indianapolis Indiana
Mailing Address: 6125 E. 21st Street, Mail Stop 4, Indianapolis Indiana 46219-2058
FESOP No.: F097-5444-00100

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:

- 9 Annual Compliance Certification Letter
- 9 Deviation Occurrence Reporting Form (For Control Equipment Monitoring)
- 9 Deviation Occurrence Reporting Form (For Material Usage, Quality, Etc.)
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

State Form 47739 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION**

**INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
 AIR QUALITY MANAGEMENT SECTION, DATA COMPLIANCE**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 DEVIATION OCCURRENCE REPORT
 (For Control Equipment Monitoring Only)**

Source Name: Hughes Technical Services Company - Indianapolis
 Source Address: 6125 E. 21st Street, Indianapolis Indiana
 Mailing Address: 6125 E. 21st Street, Mail Stop 4, Indianapolis Indiana 46219-2058
 FESOP No.: F097-5444-00100

If a deviation has occurred, a separate copy of this report must be submitted for each monitoring device on all control equipment listed in this permit. Attach a signed certification to complete this report.	
Stack/Vent ID:	
Control Equipment: (ex: thermal oxidizer, scrubber, baghouses)	
Type of Parameter Monitored: (ex: temperature, pressure drop, efficiency)	
<input checked="" type="checkbox"/> Continuously	<input type="checkbox"/> Periodically, at a frequency of:
Parameter Operating Restrictions/Range: (ex: 1,400°F, 2-4 psi pressure drop)	
Report Covers From: (date: month/day/yr)	To:
<input checked="" type="checkbox"/> Summary of Deviations from the Parameter Restriction/Range During the Monitoring Period are Identified Below. Complete Records Maintained at the Facility.	

	For Parameter Recorded Continuously	For Parameter Recorded Periodically
Total Unit Operating Time		
Total Time of Deviations (Identify All Deviations)		
Percent of Time Indicating Deviations ($\frac{2}{1} \times 100$)		

Date of Deviation	Start/Stop Time of Deviation (Continuous Monitoring Only)	Actual Value Recorded	Reason for Deviation & Corrective Action Taken

State Form 47741 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT,
COMPLIANCE DATA SECTION**

**INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION,
DATA COMPLIANCE**

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

Source Name: Hughes Technical Services Company - Indianapolis
Source Address: 6125 E. 21st Street, Indianapolis Indiana 26219-2058
Mailing Address: 6125 E. 21st Street, Mail Stop 4, Indianapolis Indiana 46219-2058
FESOP No.: F097-5444-00100

If a deviation has occurred a separate copy of this report must be submitted for **each** material type, quantity usage and operation limitation (except control equipment monitoring) listed in this permit .
Attach a signed certification to complete this report.

Stack/Vent ID:
Equipment/Operation:
Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit: (ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)
Determination Period for this Parameter: (ex: 365-day rolling sum, fixed monthly rate)
<input checked="" type="checkbox"/> Permit Has No Rate Limitations for this Parameter.
Content Restriction for this Parameter: (ex: maximum of 40% VOC in inks, 0.5% sulfur content)
Demonstration Method for this Parameter: (ex: MSDS, Supplier, material sampling & analysis)
<input checked="" type="checkbox"/> Permit Has No Content Limitations for this Parameter.
Comments:

State Form 47738 (5-96)

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION,
DATA COMPLIANCE**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Hughes Technical Services Company - Indianapolis
Source Address: 6125 E. 21st Street, Indianapolis Indiana 46219-2058
Mailing Address: 6125 E. 21st Street, Mail Stop 4, Indianapolis Indiana 46219-2058
FESOP No.: F097-5444-00100

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

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

(can omit boiler affected if only one gas boiler at this plant)

I certify under penalty of law that at all times, except as otherwise noted above, only natural gas was burned in the indicated boilers during the report period. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, DATA COMPLIANCE**

FESOP Semi-Annual Report

Source Name: Hughes Technical Services Company - Indianapolis
Source Address: 6125 E. 21st Street, Indianapolis, Indiana 46219-2058
Mailing Address: 6125 E. 21st Street, Mail Stop 4, Indianapolis, Indiana 46219-2058
FESOP No.: F097-5444-00100
Facility: Nebraska Boilers (emissions units 1-3)
Parameter: Sulfur Dioxide
Limit: Less than 2,588.44 thousand gallons of fuel oil combusted per twelve consecutive month period and less than 0.49% sulfur by weight in all Fuel Oil combusted.

Month	Fuel Oil Throughput (gal/month)	Fuel Oil Throughput for Previous 12 consecutive months (gal/12 months)	Sulfur Content

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION**

**INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
 AIR QUALITY MANAGEMENT SECTION, DATA COMPLIANCE**

FESOP Quarterly Report

Source Name: Hughes Technical Services Company - Indianapolis
 Source Address: 6125 E. 21st Street, Indianapolis, Indiana 46219-2058
 Mailing Address: 6125 E. 21st Street, Mail Stop 4, Indianapolis, Indiana 46219-2058
 FESOP No.: F097-5444-00100
 Facility: Paint Booths identified as Emissions Units (EU) 4, 5, 6, 7, and 8.
 Parameter: VOC
 Limit: less than 15 pounds per day for each Paint Booth (EU4, EU5, EU6, EU7 and EU8).

Month: _____ Year: _____

Day	Pounds of VOC emitted this day					Day	Pounds of VOC emitted this day				
	EU4	EU5	EU6	EU7	EU8		EU4	EU5	EU6	EU7	EU8
1						17					
2						18					
3						19					
4						20					
5						21					
6						22					
7						23					
8						24					
9						25					
10						26					
11						27					
12						28					
13						29					
14						30					
15						31					
16											

(use one sheet per month for each month in the quarter)

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

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

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

and

**Indianapolis Environmental Resources Management Division
Air Quality Management Section**

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

Source Background And Description

Source Name:	Hughes Technical Services Company - Indianapolis
Source Location:	6125 E. 21 st Street, Mail Stop 4, Indpls., Indiana 46219-2058
County:	Marion
SIC Code:	3662
Operation Permit No.:	F097-5444-00100
Permit Reviewer:	Patrick Coughlin

The Environmental Resources Management Division (ERMD) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Hughes Technical Services Company - Indianapolis relating to the operation of Avionic Equipment Manufacturing.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- a) Three 20.25 MMBtu per hour Nebraska boilers, identified as emission units 1, 2 and 3. Each boiler is fired with either natural gas or distillate oil. Each of the three (3) boilers were constructed after June 9, 1989. Emissions are exhausted to a separate stack for each boiler and are identified as stack vents S₁, S₂ and S₃.
- b) The Production Paint Booths 1-4, identified as emission unit 4 through 7 and the Aircraft Armament Equipment Paint Shop, identified as emission unit 8.
 - 1) The Production Paint Booth 1, emission unit 4, is each equipped with one atomized airless spray gun and a dry filter to control particulate emissions from over spray. Production Paint Booth 1 is used to coat avionics equipment. This booth was constructed in 1987. Emissions from Production Paint booths 1 is vented out stacks identified as stack/vent S₄.
 - 2) The Production Paint Booth 2, emissions unit 5, is each equipped with one atomized airless spray gun and a dry filter to control particulate emissions from over spray. Production Paint Booth 2 is used to coat avionics equipment. This booth was constructed in 1987. Emissions from Production Paint booths 1 is vented out stacks identified as stack/vent S₅.

- 3) The Production Paint Booth 3, emission unit 6, is each equipped with one atomized airless spray gun and a dry filter to control particulate emissions from over spray. Production Paint Booth 3 is used to coat avionics equipment. This booth was constructed in 1987. Emissions from Production Paint booths 1 is vented out stacks identified as stack/vent S₆.
 - 4) The Production Paint Booth 4, emission unit 7, is each equipped with one atomized airless spray gun and a dry filter to control particulate emissions from over spray. Production Paint Booth 4 is used to coat avionics equipment. This booth was constructed in 1987. Emissions from Production Paint booths 1 is vented out stacks identified as stack/vent S₇.
 - 5) The Aircraft Armament Equipment Paint Shop, emission unit 8, is equipped with an airless atomized sprayer with a dry filter to control over spray. This paint booth is used to coat avionics equipment. This booth was installed in 1995. Emission are vented out one stack identified as Stack vent S₈
- c) Deburring operation, identified as emission unit 9. This facility was installed in 1982. The particulate emissions from this unit are controlled by a venturi scrubber which exhausts out one stack identified as S₉.

There are no unpermitted facilities operating at this source during this review process.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- 1) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, automobile, having a storage capacity less than or equal to 10,500 gallons.
- 2) A petroleum fuel, other than gasoline dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- 3) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
- 4) Machining where an aqueous cutting coolant continuously floods the machining interface.
- 5) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6
- 6) Cleaners and solvents characterized as follows:
 - A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100 F) or;
 - B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 C (68 F);the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- 7) The following equipment related to manufacturing activities not resulting in emissions of

- HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- 8) Activities associated with the treatment of waste streams with an oil and grease content less than or equal to 1% by volume.
 - 9) Forced and induced draft cooling tower systems not regulated under a NESHAP
 - 10) Paved and unpaved roads and parking lots with public access
 - 11) Asbestos abatement projects regulated by 326 IAC 14-10
 - 12) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
 - 13) Blowdown for any of the following: sight glass; boiler; compressors; pumps and cooling towers.
 - 14) Furnaces used for melting metals other than beryllium with a brim full capacity of less than or equal to 450 cubic inches by volume.
 - 15) Emergency generators as follows:
 - Diesel generators not exceeding 1600 horse power.
 - 16) A laboratory as defined in 326 IAC 2-7-1(20)(C)

Existing Approvals

This source has been operating under the following approvals:

- (1) Construction Permit Number 880100-01, issued on November 11, 1988 for the installation and operation of three Nebraska Boilers.
- (2) Operating Permit, issued on September 30, 1992 for the operation of 3 Nebraska Boilers, The Production Paint Booth, Public Works Paint Booth and Deburring Operation

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on March 14, 1996. Additional information was received on August 11, 1997.

Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations (pages 1 through 5 in Appendix A).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1)

pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	38
PM-10	38
SO ₂	128
VOC	300
CO	9
NO _x	37

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

(See attached spreadsheets for detailed calculations **pages 1 through 5**.)

HAP	Potential Emissions (tons/year)
Individual HAP	>10
Combination of HAPs	>25

(See attached spreadsheets for detailed calculations on page 2 of 5 in Appendix A)

- (a) The potential emissions (as defined in the Indiana Rule) of SO₂ and VOCs are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

Limited Potential To Emit

- (a) To simplify recordkeeping and to accommodate unpredictable variations in production, the source has accepted federally enforceable production limitations that limit potential to emit SO₂ to 91 tons per 12 consecutive month period for each pollutant. This limit was established at 11/12 ths of 99 tons per year to eliminate the effect that daily variations would have on any 365 day period. This limit consists of:
 - (i) 90.05 tons per year of SO₂ for the significant activities; and
 - (ii) 0.7 tons of SO₂ from significant emitting activities
- (b) The VOC emissions from the five (5) paint booths (emissions units 4 through 8) are limited to less than 15 pounds per day per emitting unit such that 326 IAC 8-2-9 shall not apply. This limitation effectively limits the VOC and HAP emissions source wide to

less than major source thresholds.

- (c) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

Process/ facility	Limited Potential to Emit (tons/year)						HAPs
	PM	PM-10	SO ₂	VOC	CO	NO _x	
3 Boilers	3.7	3.7	90.05	1.3	9.3	37.3	Neg
Paint Booth EU4 EU5 EU6 EU7 EU8	2.4	2.4		2.73 2.73 2.73 2.73 2.73			Less than 3.36 tons of any single HAP Less than 13.56 tons of any comb. of HAPs
Deburring Operation	2.4	2.4	0.0	0.0	0.0	0.0	0.0
Insignificant Activities	Neg	Neg	1.3	Neg	Neg	Neg	Neg
Total Emissions	6	6	91	14	9	37	VOC limits on the paint booths EU4 through EU8 effectively limit HAP emissions below the major source thresholds.

Attached Tables (1) summarize the permit conditions and requirements.

County Attainment Status

The source is located in Marion County.

Pollutant	Status (attainment or unclassifiable/ severe, moderate, marginal, or maintenance nonattainment)
TSP	Nonattainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Maintenance
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when

evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) The (3) three 20.25 MMBtu per hour boiler (emission units 1, 2 and 3) are subject to the New Source Performance Standard for Small Industrial - Commercial - Institutional Steam Generator Units, 40 CFR Part 60.40c, Subpart Dc (312 IAC 12), because they were constructed after June 9, 1989 and have heat input capacities greater than 10 million Btu per hour. The NSPS limits the sulfur content of fuel oil combusted to no greater than 0.5 percent by weight.

Based on the information submitted the source complies with this federal regulation by using fuel oil with a sulfur content less than 0.5% by weight.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it emits more than ten (10) tons per year of NO_x and is located in Marion County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 1-6 (Malfunction Rule)

The requirements for reporting of malfunction has been replaced by the requirement emergency occurrence notification requirements under 326 IAC 2-8-12.

326 IAC 2-8 (Federally Enforceable State Operating Permit Program)

Source has potential to emit SO₂ above the major source threshold. However, actual emissions are less than major source threshold; therefore, the source qualifies as a FESOP source. The

source has agreed to accept the following restrictions to avoid the requirements of the Part 70 Operating Permit Program.

The total gallons of fuel oil combusted in the three 20.25 MMBtu per hour Nebraska Boilers (emissions units 1, 2 and 3) shall not exceed 2,588.44 thousand gallons per twelve (12) month sum, rolled monthly. This fuel usage restriction is equivalent to a source wide sulfur dioxide emissions limitation of 91 tons per twelve consecutive month period such that 326 IAC 2-7 (Part 70 Permit Program) shall not apply. See page 1 of 5 in Appendix A for detailed calculations.

State Rule Applicability - Individual Facilities

326 IAC 1-6-3 (Preventive Maintenance Plans)

Each of the 20.25 MMBtu per hour Nebraska Boiler (emissions units 1, 2 and 3) are required to have a Preventive Maintenance Plan since these boilers have allowable emissions above the permit thresholds established in 326 IAC 2-1-2 and 326 IAC 2-1-4.

326 IAC 1-7 (Stack Height Provisions)

All three boilers (emissions units 1, 2 and 3) each have potential SO₂ emissions in excess of 25 tons per year and were constructed after June 19, 1979. Based on the information supplied in the application stacks 1, 2 and 3 do not comply with the GEP stack height requirements. The GEP stack height for these stacks was calculated to be 95 ft. (the actual stack height listed in the application is 50 ft.) based on the following equation:

$$S = H + 1.5 (L) \quad \text{where: } S = \text{Stack height, (feet)}$$
$$H = \text{Height of supporting or nearby structure (whichever is largest), (feet) , 38 ft}$$
$$L = \text{Lesser dimension (height or width) of the structure chosen for H, (feet), 38 ft}$$

A screening model analysis conducted by ERMD using the actual stack height of 50 ft. showed no violation of the three (3) hour or twenty four (24) hour National Ambient Air Quality Standard for SO₂. The screening modeling analysis predicted a maximum one hour concentration (175 ug/m³) for one boiler, this concentration was multiplied by 3 to account for the three identical units (525 ug/m³), adjusted to reflect a 3 hour (525 ug/m³ x 0.9 = 472 ug/m³) and 24 hour (525 ug/m³ x 0.4 = 201 ug/m³) averaging times, and compared against the NAAQS for SO₂ (1,300 ug/m³ 3 hour average and 365 ug/m³ for 24 hour average). Please note that the results from the screening analysis are very conservative estimates of the ambient concentrations. Based on the results of the screening model analysis and the fact that these facilities was issued approval to construct pursuant to 326 IAC 2-1, ERMD is not requiring Hughes Technical Services to comply with the GEP stack height requirements.

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

All three boilers (emission units 1, 2 and 3) are subject to the PM limits in 326 IAC 6-2-4. This regulation applies since these units do not have actual PM emissions greater than 10 tons per year, are used for indirect heating and were all installed after September 21, 1983. Pursuant to 326 IAC 6-2-4, particulate matter (PM) emissions shall be limited by the following equation

$$Pt = \frac{1.09}{Q^{0.26}}$$

- Where Pt = Pounds of PM emitted per million Btu(lb/mmBtu) heat input. Pt is equivalent to 0.37 lbs/mmBtu or 7.49 lbs/hr at maximum heat input capacity.
- Q = Total source maximum operating capacity rating in mmBtu per hour heat input. Q is equivalent to 60.75 MMBtu per hour since all three boilers were installed at the same time..

Using the AP-42 Table 1.3-2, (PM emission factor of 2 lbs PM/kgal of fuel oil) the PM emissions at maximum operating capacity were calculated to be 0.28 lbs/hr which appears to comply with the emission limitation specified by 326 IAC 6-2-4.

326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations)

Because the potential SO₂ emissions from three 20.25 MMBtu per hour boilers (emission units 1, 2 and 3) exceed 25 tons per year the Sulfur Dioxide Emissions Limitation Regulation 326 IAC 7-1.1-2 applies to these facilities. Pursuant to 326 IAC 7-1.1-2 the SO₂ emissions limitation for these boilers is 0.5 lb/MMBtu for distillate oil based on a calendar month average.

These boilers are also regulated under NSPS Subpart Dc. The SO₂ emissions limitation under Subpart Dc is 0.5 lb/MMBtu for all oil combustion based on a 30 day average or as an alternative the a fuel oil sulfur content of not greater than 0.5 percent.

To simplify the compliance determination provisions, ERMD has established conditions in the permit which limit the fuel oil sulfur content to 0.49 percent sulfur. This fuel oil sulfur limits satisfy both the requirements of 326 IAC 7-1.1-2 and NSPS Subpart Dc. The fuel oil sulfur limit was calculated based on the following equations:

$$\frac{0.5 \text{ lbs}}{\text{MMBtu}} \times \frac{0.14 \text{ MMBtu}}{\text{gal}} \div \frac{142 \text{ lbs}}{1000 \text{ gal}} = 0.49\% \text{ Sulfur by Wt.}$$

326 IAC 8-2-9 Miscellaneous Metal Parts Coating Operations

This regulation will apply to emissions units 4 through 8 separately (four production paint booths and one Aircraft Armament Paint Shop), if the actual VOC emissions exceed fifteen (15) pounds per day per emission unit. This regulation is potentially applicable since these facilities are located in Marion county and are being used to coat metal parts under the Standard Industrial Classification Code of major group 36. The FESOP limits the VOC emissions for each booth separately to less than 15 pounds per day each such that Miscellaneous Metal Parts Regulation 326 IAC 8-2-9 shall not apply. According to source usage records these booths do not emit more than fifteen (15) pounds of VOCs per day per booth.

326 IAC 6-3 Process Weight Regulation

This regulation applies to the PM emissions from emissions units 4 through 9 separately (four

production paint booths, one Aircraft Armament Paint Shop Booth and one Deburring Operation). This regulation is generally applicable to all sources of particulate emissions not otherwise regulated under Article 6. With respect to the paint booths the limit is stated as an equation (see the equation given below), since the process weight rate is variable and no realistic maximum process throughput can be identified. With respect to the Deburring operation the particulate emissions were limited to 0.55 pounds per hour which corresponds to a process throughput of 0.05 tons per hour using the following equation;

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

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

326 IAC 8-3-5 Cold Cleaner Degreaser Operation and Control

This regulation applies the Safety Kleen degreasing operation. This regulation is generally applicable to all degreasing operations located in Marion County.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

The three (3) Nebraska Boilers has applicable compliance monitoring conditions as specified below:

- (a) Visible Emissions Notations
 - (1) Daily visible emission notations shall be performed during normal daylight operations when combusting fuel oil in any one of the (3) three 20.25 million Btu per hour Nebraska boilers (emission units 1, 2 and 3). A trained employee shall record whether emissions are normal or abnormal.
 - (2) 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.

- (3) 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.
- (4) 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.
- (5) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

These monitoring conditions are necessary because to ensure continuous compliance with the particulate emissions limitation.

The two (2) Paint Booths (emissions units 4 and 5) has applicable compliance monitoring conditions as specified below:

- (a) Monitoring
 - (1) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters.
 - (2) Weekly inspections shall be performed of the coating emissions from the stack and the presence of over spray on the nearby ground.
 - (3) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an over spray emission, evidence of over spray emission, or other abnormal emission is observed.
 - (4) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because to ensure continuous compliance with particulate limit.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.
- (b) The VOC limit for emission units 4 through 8 effectively limit the HAP emissions to less than major source thresholds.

Conclusion

The operation of this avionic equipment manufacturing facility will be subject to the conditions of the attached proposed FESOP No. F097-5444-00100.

Table (1)

Stack/Vent ID: 1, 2 and 3			
Stack/Vent Dimensions: Varies			
Emission Unit: 1, 2 and 3			
Date of Construction: After June 9, 1989			
Alternative Scenario: NA			
Pollution Control Equipment: None			
General Description of Requirement:	Short term SO ₂ limit	Long term SO ₂ limit	Short term PM limit
Numerical Emission Limit:	0.5 lbs/MMBtu	90.05 tons/yr	0.37 lbs/MMBtu
Regulation/Citation:	326 IAC 7-1.1-2 40 CFR 60.42c	326 IAC 2-8	326 IAC 6-2-4
Compliance Demonstration:	0.49% S	2,588 thousand gal of fuel oil per 12 month rolling sum	Stack Testing (not required in FESOP)
PERFORMANCE TESTING			
Parameter/Pollutant to be Tested:	% Sulfur by Wt.	None required	None required
Testing Method/Analysis:	Method 19	NA	NA
Testing Frequency/Schedule:	Each Shipment of Fuel oil	NA	NA
Submittal of Test Results:	NA	NA	NA
COMPLIANCE MONITORING			
Monitoring Description:	NA	NA	Visible Emissions Notation
Monitoring Method:	NA	NA	Observation
Monitoring Regulation/Citation:	NA	NA	NA
Monitoring Frequency:	NA	NA	Daily when combusting fuel oil
RECORD KEEPING			
Parameter/Pollutant to be Recorded:	%S for fuel oil combusted	Gallons of fuel oil combusted per 12 month rolling sum	NA
Recording Frequency:	Per fuel shipment	Monthly	NA
Submittal Schedule of Reports:	Per fuel shipment	Monthly	NA
REPORTING REQUIREMENTS			
Information in Report:	%S for each fuel oil shipment received	monthly and 12 month rolling sum of fuel oil usage	NA
Reporting Frequency/Submittal:	Semi-Annually	Semi-Annually	NA
Additional Comments:			

Table (2)

Stack/Vent ID: S4,S5,S6,S7,S8		
Stack/Vent Dimensions: Varies		
Emission Unit: 4, 5, 6, 7, and 8		
Date of Construction: emissions units #4 through 7 - 1987, emissions unit #8 - 1995		
Alternative Scenario: NA		
Pollution Control Equipment: Dry Filter		
General Description of Requirement:	Short term VOC limit	Short term PM limit
Numerical Emission Limit:	Less the 15 Lbs/day /emissions unit	$E=4.10 \times P^{0.67}$
Regulation/Citation:	such that 326 IAC 8-2-9 shall not apply	326 IAC 6-3
Compliance Demonstration:	Recordkeeping	Stack Testing (not required in FESOP)
PERFORMANCE TESTING		
Parameter/Pollutant to be Tested:	None required	None required
Testing Method/Analysis:	NA	NA
Testing Frequency/Schedule:	NA	NA
Submittal of Test Results:	NA	NA
COMPLIANCE MONITORING		
Monitoring Description:	NA	Filter inspections
Monitoring Method:	NA	Observation
Monitoring Regulation/Citation:	NA	NA
Monitoring Frequency:	NA	Weekly
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Daily VOC emissions per emissions unit	NA
Recording Frequency:	Daily	NA
Submittal Schedule of Reports:	NA	NA
REPORTING REQUIREMENTS		
Information in Report:	Daily VOC emissions per emissions unit	NA
Reporting Frequency/Submittal:	Quarterly	NA
Additional Comments:		

**Indianapolis Environmental Resource Management Division(ERMD)
Air Quality Management Section**

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

**Hughes Technical Services Company
6125 E. 21st Street (Mail Stop 4)
Indianapolis, Indiana 46219-2058**

F097-5515-0078

On September 5, 1997, the Environmental Resources Management Division (ERMD) had a notice published in the Indianapolis Star Newspaper, Indianapolis, Indiana, stating that Hughes Technical Services Company had applied for a Federally Enforceable State Operating Permit (FESOP) to operate an Avionic Equipment Manufacturing Operation. The notice also stated that ERMD proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

During the Public Comment Period ERMD received the following comments from Hughes Technical Services Company:

1. Page 3 of 42 Condition A.2, Page 30 of 42 Section D.2 Description, Page 30 of 42 Condition D.2.3, Page 42 of 42 Quarterly reporting form, and Pages 1, 5, 8 and 12 in the TSD - Public Works Paint Booth has been renamed Aircraft Armament Equipment Paint Shop.

ERMD has revised the name of the booth as requested

2. Page 5 of 42 Condition A.1 the responsible official has been changed to Charles D. Jones

ERMD has changed the name of the responsible official as requested.

3. Page 5 of 42 Condition A.2 b) 1), and page 4 in the TSD - each paint booth has its own stack, but they have been historically been considered as one facility by the ERMD. Hughes Technical Services Company believes that each booth should be treated as a separate facility. These booths are configured so they can operate independently. There are no common internal booth walls which could be easily removed to reconfigure the system has one large paint booth and effectively "increment" four small booths into one large one.

ERMD agrees that the four production paint booths should be treated as four separate facilities since these booths can operate independently and have separate exhaust stacks. ERMD has revised the facility descriptions in Condition A.2 b), Section D.2 and the TSD. As separate facilities the VOC emissions limit for each of the four production paint booth 1 though 4 has been revised such that each booth is limited to less than 15 pounds of VOCs per day so that the Miscellaneous Metal Parts Regulation 326 IAC 8-2-9 shall not apply to each of these booths independently.

4. Page 5 of 42 A.3 and page 2 of the TSD - fueling does not involve tanks and locomotives

ERMD has revised this description of insignificant emitting.

5. Page 6 of 42 Condition A.3 f) and Page 34 of 24 Section D.4 - Degreasers used are leased from Safety Kleen. Safety Kleen Premium Gold Solvent (part number 6638) is 100% volatile. Safety Kleen delivers 1873 pounds of this solvent over an 8 month period. This volume prorates to 2810 pounds per year. Safety Kleen recovers 90 to 95% of this solvent by their estimates at changeout, so this portion is not volatilized. This would leave about 281 pounds emitted per year. The density is 6.8 pounds per gallon, which equates to about 41 gallons per year.

ERMD has listed this facility as an insignificant emitting activity under condition A.3 f). However this facility is required to comply with the generally applicable requirements of 326 IAC 8-3-5. Since this facility is located on the Hughes Technical Services property, Hughes Technical Services is required to make sure this facility complies with 326 IAC 8-3-5.

6. Page 6 of 42 Condition A.3 j) and page 2 of TSD - The heat treat process has been removed

ERMD has removed the heat treating process from the list of insignificant emitting activities.

7. Page 17 of 42 Condition B.25(e) - Use of photographic equipment by the agency to assure compliance is subject to company security measures.

ERMD has revised Condition B.25(e) to read as follows:

“Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. Use of photographic equipment is subject to Hughes Technical Services security measures. [326 IAC 2-8-5(a)(4)]”

8. Page 19 of 42 Condition C.7 Does this section also incorporate Indianapolis/Marion County Air Board regulation in addition to state requirements?

The Indianapolis Air Pollution Control Board regulations are currently being revised. At this time all references to the IAPCB regulations are not being incorporated into the FESOPs issued by ERMD. However sources are still required to comply with the IAPCB regulations. ERMD will be incorporating the IAPCB regulations at a later date when the rules are revised. The IAPCB regulations are expected to be the same as the state regulations with the exception of the permit and asbestos regulations.

9. Page 20 of 42 Condition C.12 - Is this consistent with the levels established by the Indianapolis Air Board?

See response to comment 12.

10. Page 21 of 42 Condition C.12 (f) Does this address the need for accredited Asbestos Project Designer for any abatement project?

Condition C.12 is recited for 326 IAC 14-10-1(a). While this condition does not specifically mention asbestos project designers, it is ERMD position that asbestos project designers need to be Indiana Accredited Asbestos Inspectors.

11. Page 25 of 42 Condition C.19 (f) change to the proper date

This condition has been revised to read as follows:

“The first report shall cover the period commencing the date of issuance of this permit

and ending December 30, 1997.”

12. Page 27 of 42 Condition D.1.2 - Should there be units “pounds” after 0.37?
ERMD has revised this condition to include the word “pounds” after 0.37
13. Page 32 of 42 Condition D.3.5 - States daily, but D.3.5(a) states weekly
ERMD has revised the language to be consistent with the requirement of weekly visible emissions notations.
14. Page 5, 36,37,38,39,40,41 of 42 in the FESOP and page 1 of 12 in the TSD - The mail stop should be changed to mail stop 4.
ERMD has revised the mail address as requested.
15. Page 39 of 42 there is no form for reporting natural gas use.
Natural Gas usage is not required to be reported since there are no applicable regulations indirectly limiting the amount of natural gas that can be combusted.
16. Page 41 of 42 and Page 4 and 5 in the TSD - Production Paint Booth 1 through 4, each booth should have its own VOC limit.
ERMD has revised the VOC emissions reporting form to reflect the new VOC limits of 15 pounds per day per booth.
17. Page 4 and 5 of the TSD Table of limited potential to emit - clarify that limits apply separately to each boiler and each paint booth.
This table has been revised to clarify the separate limits for each paint booth. With respect to the boilers there is only one long term tons per year limit. Please note that this table is only required to document that the total source wide emissions are below the Part 70 applicability thresholds.
18. Page 7 of the TSD, vary should be very.
ERMD has corrected this Typo.
19. Page 11 and 12 of the TSD Tables (1) (2) Compliance demonstration short term PM limit shows stack testing but it is not required in section D.4 of the FESOP.
No stack testing of this unit is required however stack testing is the appropriate method to determine compliance. ERMD has deleted the statement for table (1) and (2).

Hughes Technical Services
Indianapolis, Indiana
Permit Reviewer: Patrick Coughlin

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**Three (3) Nebraska Boilers
(Emissions Units 1, 2 and 3)
Combustion Emissions**

Boiler 1,2 and 3 heat input capacity	20.25	MMBtu/hr (each)
Heat Content of #2 Fuel Oil	145,000.00	Btu/gal
Heat Content of Natural Gas	1,000.00	Btu/cf
Maximum Firing Rate #2 Fuel Oil	0.140	Mgal/hr
Maximum Firing Rate Natural Gas	0.020	MMcf/hr

Distillate Fuel Oil usage (limited)	2,588.45	kgals/year
Natural Gas usage (not limited)	375,324.58	MMBtu/yr
S = Weight % Sulfur	0.49	%

Source of Emissions Factors	Pollutant						
	PM	PM-10	SO2	NOx	VOC	CO	Lead
Distillate Oil (lb/kgal) AP-42	2.00	1.00	69.58	20.00	0.20	5.00	0.00
Natural Gas (lbs/MMcf) AP-42	14.00	14.00	0.60	140.00	4.81	35.00	0.00

Type of Fuel	Potential Emissions for All Boilers Combined (tons/yr)						
	PM	PM-10	SO2	NOx	VOC	CO	Lead
Distillate Oil	3.67	1.84	127.68	36.70	0.37	9.18	0.002
Natural Gas	3.73	3.73	0.16	37.25	1.28	9.31	0.0001
Potential Emissions	3.73	3.73	127.68	37.25	1.28	9.31	0.002
Total Limited PTE (tons/yr)	3.73	3.73	90.05	37.25	0.37	9.31	0.0016

Methodology:

1 gallon of No. 2 Fuel Oil has a heating value of 145,000 Btu, Natural Gas has a heating value of 1000 Btu/cf.
 Emission Factors are from AP 42, Tables 1.3-2 and 1.3-4 (SCC 1-02-005-01/02/03) for Distillate Oil and AP-42, Tables 1.4-1,2,3, and 5 for Natural Gas
 Emissions from Distillate Oil Combustion - Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton
 Emissions from Natural Gas Combustion - Emission (tons/yr) = Throughput (MMcf/ yr) x Emission Factor (lb/MMcf)/2,000 lb/ton

Fuel usage limitation for both boilers combined such that 326 IAC 2-7 shall not apply for SO2

$$(90.75 \text{ ton/yr} - 0.16 \text{ tons/yr} - 0.54 \text{ tons/yr}) \times 2000 \text{ lbs/ton} / (142 (0.49) \text{ lbs/1000 gal}) = 2588445.39 \text{ gallons}$$

Note: 0.16 tons/yr of SO2 is equivalent to the potential SO2 emissions from Natural Gas Combustion.
 0.54 tons/yr of SO2 is equivalent to the potential SO2 emissions from insignificant emitting activities.

Allowable Particulate Emissions

$$Pt = 1.09/Q^{0.26}$$

$$Pt = 0.37 \text{ lbs/MMBtu}$$

$$Q = 60.75 \text{ MMBtu/hr}$$

**Public Works and Production Paint Booth
(Emissions Unit 4, 5,6,7 and 8)
From Surface Coating Operations**

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Pounds VOC per gallon of coating less water
Specialty Coating	8.0	42.00%	0.0%	42.0%	0.0%	0.00%	3.36
Epoxy Mil C-22750	11.6	29.40%	0.0%	29.4%	0.0%	3.60%	3.41
Epoxy Primer MIL-P-23377	8.6	70.00%	0.0%	70.0%	0.0%	30.00%	6.04
Polyurethane MIL-C-85258	10.2	38.00%	0.0%	38.0%	0.0%	46.00%	3.88
Type II Epoxy Thinner MIL-81772	7.0	100.00%	0.0%	100.0%	0.0%	0.00%	7.00

Material	Gallons of Material required for one production unit	Maximum No. of Production Units per hour	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	Transfer Efficiency
Specialty Coating	0.1600	3.17	1.70	40.90	7.46	0.89	60%
Epoxy Mil C-22750	0.0400	146.7	20.01	480.29	87.65	10.28	60%
Epoxy Primer MIL-P-23377	0.0200	99.43	12.01	288.32	52.62	3.48	60%
Polyurethane MIL-C-85258	0.0200	121.8	9.44	226.61	41.36	4.27	60%
Type II Epoxy Thinner MIL-81772	0.0200	180	25.20	604.80	110.38	6.31	60%

Potential emissions (tons/yr): **299.47** **25.23**

Material	Percentage HAP in Top 5 Coating and Solvents Resulting in the Max HAP Emissions				
	Xylene	Toluene	MEK	Ethly Benzene	MIK
Specialty Coating	0.00%	0.00%	50.00%	0%	0%
Epoxy Mil C-22750	0.71%	9.17%	15.88%	0.00%	0.00%
Epoxy Primer MIL-P-23377	0.00%	5.00%	20.00%	0%	0%
Polyurethane MIL-C-85258	1.00%	1.00%	5.00%	1%	15%
Type II Epoxy Thinner MIL-81772	0.00%	0.00%	39.15%	0%	0%

Material	Individual HAP Potential Emissions (tons/yr)				
	Xylene	Toluene	MEK	Ethly Benzene	MIK
Specialty Coating	0.00	0.00	8.89	0.00	0.00
Epoxy Mil C-22750	0.62	8.04	13.92	0.00	0.00
Epoxy Primer MIL-P-23377	0.00	3.76	15.03	0.00	0.00
Polyurethane MIL-C-85258	1.09	1.09	5.44	1.09	16.32
Type II Epoxy Thinner MIL-81772	0.00	0.00	43.21	0.00	0.00

Total Individual HAP Emissions **1.71** **12.89** **86.49** **1.09** **16.32**
Total Combined HAP Emissions **118.50**

Limited Potential to Emit

Material	Gallons of Material required for one production unit	Limited PTE Pounds of VOC per Day	Pounds VOC per gallon of coating less water	Volume % Non-Vol (solids)	Maximum Gallons per Day	Maximum pound of coating per day	Maximum pounds of particulate per day	Maximum tons of particulate per year per booth
Specialty Coating	0.1600	15	3.36	0.00%	4.46	35.71	0.00	0.00
Epoxy Mil C-22750	0.0400	15	3.41	3.60%	4.40	51.02	0.73	0.67
Epoxy Primer MIL-P-23377	0.0200	15	6.04	30.00%	2.48	21.43	2.57	2.35
Polyurethane MIL-C-85258	0.0200	15	3.88	46.00%	3.87	39.47	7.26	6.63
Type II Epoxy Thinner MIL-81772	0.0200	15	7.00	0.00%	2.14	15.00	0.00	0.00

Material	Individual HAP Potential Emissions (tons/yr)				
	Xylene	Toluene	MEK	Ethly Benzene	MIK
Specialty Coating	0.00	0.00	3.26	0.00	0.00
Epoxy Mil C-22750	0.07	0.85	1.48	0.00	0.00
Epoxy Primer MIL-P-23377	0.00	0.20	0.78	0.00	0.00
Polyurethane MIL-C-85258	0.07	0.07	0.36	0.07	1.08
Type II Epoxy Thinner MIL-81772	0.00	0.00	1.07	0.00	0.00

**Deburring Operation
(Emission Unit 9)**

Number of Part in 1995	106945
Average weight of each part ,(oz)	17
Assume 2% lost in deburring	2.00%
Operating Schedule, (hr/yr)	1095
Throughput, (part/hour)	97.67
Throughput, (lbs/hour)	103.77

	lbs/hr	lbs/day	tons/yr
Potential Emissions	2.08	49.81	9.09

Throughput (tons/hr) 0.05
 Allowable Emission (326 IAC 6-3) 0.55 lbs/hr
 Actual Emissions (based on 75% CE) 0.52 lbs/hr

Insignificant Emitting Activities

Diesel Generator

665	HP
Diesel	Fuel
0.4	% Sulfur by Wt. (AP-42)
0.00809	Lbs SO ₂ /HP-hr
0.000728	Lbs VOC/HP-hr
2.15	lbs SO ₂ /hr
0.48	lbs VOC/hr
0.54	tons SO ₂ /yr
0.12	tons VOC/yr

326 IAC 7-1.1-2 Applicability

SO₂ emissions are less than 10 lbs/hr and 25 tons/yr
therefore 7-1.1-2 does not apply.

326 IAC 6 Applicability

The facilities potential PM emissions are less than 10 tons/yr
therefore 6-1-2 does not apply

The facility is not involve indirect heating, therefore 6-2 does
not apply.

It would appear as if the process weight rate rule 326 IAC 6-3
would apply to the emergency generator.

Source Wide Emissions Summary

	Unrestricted PTE (tons/yr)					
	TSP	PM-10	SO ₂	NO _X	VOC	CO
Three Nebraska Boilers (emission units 1, 2 and 3)	3.73	3.73	127.68	37.25	1.28	9.31
Paint Booth (emission units 4, 5, 6, 7, and 8)	25.23	25.23	0.00	0.00	299.47	0.00
Deburring Operation (emission unit 9)	9.09	9.09	0.00	0.00	0.00	0.00
Insignificant Emitting Activities	Neg	Neg	0.54	Neg	0.12	Neg
Total Potential Emissions	38.04	38.04	128.22	37.25	300.87	9.31

	Restricted PTE (tons/yr)					
	TSP	PM-10	SO ₂	NO _X	VOC	CO
Three Nebraska Boilers (emission units 1, 2 and 3)	3.73	3.73	90.21	37.25	0.37	9.31
Paint Booth (emission units 4, 5, 6, 7, and 8)	0.25	0.25	0.00	0.00	13.69	0.00
Deburring Operation (emission unit 9)	2.41	2.41	0.00	0.00	0.00	0.00
Insignificant Emitting Activities	Neg	Neg	0.54	Neg	0.12	Neg
Total Limited PTE	6.39	6.39	90.75	37.25	14.18	9.31

Limited PTE for SO₂ Emissions

Three (3) Nebraska Boilers (Fuel Oil), cap is on fuel oil	90.05	tons/yr
Three (3) Nebraska Boilers (Natural Gas)	0.16	tons/yr
Insignificant Emitting Activities	0.54	tons/yr
	90.75	tons/yr

The VOC limit of less than 15 lbs per day for emission units 4,5,6,7 and 8 satisfies the requirement to limit HAP emissions to less than 10 tons of an individual HAP and 25 tons of any combination of HAPs.