

**PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT
and EVANSVILLE ENVIRONMENTAL PROTECTION
AGENCY**

**Bootz Manufacturing Company
1400 Park Street Evansville, Indiana 47719 (Plant #1)
2301 Maryland Street, Evansville, Indiana 47719 (Plant #2)**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T163-6551-00011	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary fabricated metal bath tub, sink, and lavatory manufacturing operation.

Responsible Official: Thomas Bootz, Vice President of Engineering
Source Address: 1400 Park Street, Evansville, Indiana 47719 (Plant #1)
2301 Maryland Street, Evansville, Indiana 47719 (Plant #2)
Mailing Address: P.O. Box 6409, Evansville, Indiana 47712
Phone Number: 812-429-2240
SIC Code: 3469
County Location: Vanderburgh
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

Plant #1

- (a) One (1) primer paint spray booth, identified as Booth No. 1, utilizing an air atomized application system, coating a maximum of 180 steel parts per hour, with a water curtain for overspray control, and exhausting at one (1) stack, identified as S/V-1; and
- (b) One (1) top coat paint spray booth, identified as Booth No. 2, utilizing an air atomized application system, coating a maximum of 180 steel parts per hour, with a dry filter and water curtain for overspray control, and exhausting at one (1) stack, identified as S/V-2.

Plant #2

- (a) Two (2) Largeware Porcelain Enamel booths, the ground coat and the top coat booths, which are capable of coating 165 units per hour. These booths are equipped with eight (8) air atomization spray systems, with water wash spray to control the Particulate Matter (PM) overspray from the ground coat booth and a dust collector to control the PM overspray from the top coat booth, both exhausting to stack S/V 7;
- (b) One (1) Smallware Porcelain Enamel booth, which is capable of coating 360 units per hour. This booth is equipped with four (4) air atomization spray systems, with dust collector to control the PM overspray, exhausting to stack S/V 6;

- (c) One (1) Urea Foam spray booth, capable of coating 7 units per hour. This booth is equipped with an air atomization spray system, with dry filters to control the PM over spray, exhausting to stack S/V 1; and
- (d) One (1) natural gas-fired Largeware furnace, which is rated at 13.7 million British thermal units per hour (MMBtu/hr) and one (1) natural gas-fired Smallware furnace, which is rated at 4.6 MMBtu/hr.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

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

- (a) Natural gas fired combustion sources with heat input equal to or less than ten (10) million (MM) British thermal units (Btu) per hour including:
 - (1) one (1) permitted 6.695 MMBtu per hour natural gas fired boiler exhausting at one (1) stack, identified as S/V-7.

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

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

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

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

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

B.3 Permit Term [326 IAC 2-7-5(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 2-7-7(a)]

- (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 Evansville EPA.
- (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 Evansville EPA.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

B.6 Severability [326 IAC 2-7-5(5)]

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(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

Evansville EPA
101 N.W. Martin Luther King Jr. Boulevard
Room 250
Evansville, Indiana 47708

- (b) The Permittee shall furnish to IDEM, OAM, and Evansville EPA within a reasonable time, any information that IDEM, OAM, and Evansville EPA 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 Evansville EPA, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, and Evansville EPA along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(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; or
 - (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.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, 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) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and 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

Evansville EPA
101 N.W. Martin Luther King Jr. Boulevard
Room 250
Evansville, Indiana 47708

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Evansville EPA on or before the date it is due.
- (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 based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, and Evansville EPA may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

and

Evansville EPA
101 N.W. Martin Luther King Jr. Boulevard
Room 250
Evansville, Indiana 47708

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and Evansville EPA upon request and shall be subject to review and approval by IDEM, OAM, and Evansville EPA.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, and Evansville EPA within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

and

Telephone Number: 812-426-5597 (Evansville EPA)
Facsimile Number: 812-426-5651

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing 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

Evansville EPA
101 N.W. Martin Luther King Jr. Boulevard
Room 250
Evansville, Indiana 47708

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, and Evansville EPA may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAM, and Evansville EPA by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 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 materials of substantial economic value.

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

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, and Evansville EPA shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, and Evansville EPA has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, and Evansville EPA has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps 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

Evansville EPA
101 N.W. Martin Luther King Jr. Boulevard
Room 250
Evansville, Indiana 47708

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

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or

- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, and Evansville EPA determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, and Evansville EPA to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, and Evansville EPA at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, and Evansville EPA may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and Evansville EPA and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

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, Indiana 46206-6015

and

Evansville EPA
101 N.W. Martin Luther King Jr. Boulevard
Room 250
Evansville, Indiana 47708

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) 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) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Evansville EPA on or before the date it is due.
- (2) If IDEM, OAM, and Evansville EPA, 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, and Evansville EPA 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 Evansville EPA, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, and Evansville EPA fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

and

Evansville EPA
101 N.W. Martin Luther King Jr. Boulevard
Room 250
Evansville, Indiana 47708

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

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

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

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

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) 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) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1 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

Evansville EPA
101 N.W. Martin Luther King Jr. Boulevard
Room 250
Evansville, Indiana 47708

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 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, and Evansville EPA in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) **Emission Trades [326 IAC 2-7-20(c)]**
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) **Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.**

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, Evansville EPA, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) 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.
[326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, and Evansville EPA, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, and Evansville EPA, nor an authorized representative, may disclose the information unless and until IDEM, OAM, and Evansville EPA makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

- (2) The Permittee, IDEM, OAM, and Evansville EPA acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

Evansville EPA
101 N.W. Martin Luther King Jr. Boulevard
Room 250
Evansville, Indiana 47708

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, and Evansville EPA within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, or Evansville EPA the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity 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) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.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. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable. MCE 3.30.18.214 is a locally enforceable provision.

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

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

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable. MCE 3.30.18.212 is a locally enforceable provision.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [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) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

and

Evansville EPA
101 N.W. Martin Luther King Jr. Boulevard
Room 250
Evansville, Indiana 47708

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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). 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **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 use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in 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

Evansville EPA
101 N.W. Martin Luther King Jr. Boulevard
Room 250
Evansville, Indiana 47708

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM and Evansville EPA within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. 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 may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

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

and

Evansville EPA
101 N.W. Martin Luther King Jr. Boulevard
Room 250
Evansville, Indiana 47708

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

and

Evansville EPA
101 N.W. Martin Luther King Jr. Boulevard
Room 250
Evansville, Indiana 47708

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, and Evansville EPA, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

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

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) 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 a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, and Evansville EPA that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, and Evansville EPA that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (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) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and Evansville EPA upon request and shall be subject to review and approval by IDEM, OAM, and Evansville EPA. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps 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 response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring 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 process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps 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 [326 IAC 2-7-5]

[326 IAC 2-7-6]

-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. 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.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission 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

Evansville EPA
101 N.W. Martin Luther King Jr. Boulevard
Room 250
Evansville, Indiana 47708

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Evansville EPA on or before the date it is due.

C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, 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) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit 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 Evansville EPA 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 stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (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 for a minimum of three (3) years and available upon the request of an IDEM, OAM, and Evansville EPA representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Evansville EPA makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Evansville EPA within a reasonable time.
- (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 preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (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 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and 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
- Evansville EPA
101 N.W. Martin Luther King Jr. Boulevard
Room 250
Evansville, Indiana 47708
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Evansville EPA on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

Facility Description [326 IAC 2-7-5(15)]

Plant #1

- (a) One (1) primer paint spray booth, identified as Booth No. 1, utilizing an air atomized application system, coating a maximum of 180 steel parts per hour, with a water curtain for overspray control, and exhausting at one (1) stack, identified as S/V-1; and
- (b) One (1) top coat paint spray booth, identified as Booth No. 2, utilizing an air atomized application system, coating a maximum of 180 steel parts per hour, with a dry filter and water curtain for overspray control, and exhausting at one (1) stack, identified as S/V-2.

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-2] [326 IAC 8-1-6] [326 IAC 8-2-9]

Due to the date of construction of these facilities, 326 IAC 2-2 (PSD) does not apply and there are no 326 IAC Article 8 rules that apply.

D.1.2 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the PM emissions from each of the two (2) paint spray booths shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf). This is equivalent to a PM emission rate of 4.5 pounds per hour from Booth #1 and 7.5 pounds per hour from Booth #2.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the two (2) paint spray booths shall not exceed the pound 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.1.4 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

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

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM or Evansville EPA, compliance with the PM limits specified in Conditions D.1.2 and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Particulate Matter (PM)

The water curtain for PM control in the paint booth identified as Booth #1, and the dry filters and water curtain for PM control in the paint booth identified as Booth #2, shall be in operation at all times when the two (2) paint booths (Booth #1 and Booth #2) are in operation.

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

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters in Booth #2 and to verify that the water flow rate of the water curtains in Booths #1 and #2 meet the manufacturer's recommended level. To monitor the performance of the dry filters and water curtains, weekly observations shall be made of the overspray from the surface coating booth stacks (S/V-1 and S/V-2) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Plant #2

- (a) Two (2) Largeware Porcelain Enamel booths, the ground coat and the top coat booths, which are capable of coating 165 units per hour. These booths are equipped with eight (8) air atomization spray systems, with water wash spray to control the Particulate Matter (PM) overspray from the ground coat booth and a dust collector to control the PM overspray from the top coat booth, both exhausting to stack S/V 7;
- (b) One (1) Smallware Porcelain Enamel booth, which is capable of coating 360 units per hour. This booth is equipped with four (4) air atomization spray systems, with dust collector to control the PM overspray, exhausting to stack S/V 6;
- (c) One (1) Urea Foam spray booth, capable of coating 7 units per hour. This booth is equipped with an air atomization spray system, with dry filters to control the PM over spray, exhausting to stack S/V 1; and
- (d) One (1) natural gas-fired Largeware furnace, which is rated at 13.7 million British thermal units per hour (MMBtu/hr) and one (1) natural gas-fired Smallware furnace, which is rated at 4.6 MMBtu/hr.

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

D.2.1 Particulate Matter (PM) and Particulate Matter Less Than 10 Microns (PM-10) [326 IAC 2-2]

Total PM and PM-10 emissions from the one (1) Urea Foam spray booth shall be limited to less than 25 and 15 tons per year, respectively, therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

D.2.2 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the PM emissions from Urea Foam Spray Booth, Smallware Booth and Largeware Booths shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf). This is equivalent to a PM emission rate of 3.7 pounds per hour for each booth.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the Urea Foam Spray Booth, Smallware Booth and Largeware Booths shall not exceed the pound 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.2.4 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

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

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM or Evansville EPA, compliance with the PM limits specified in Conditions D.2.1 and D.2.2 and the PM-10 limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Particulate Matter (PM)

The dry filters in the Urea Foam Spray Booth and Largeware Booths and the dust collector in the Smallware Booth for PM control shall be in operation at all times when Urea Foam Spray Booth, Smallware Booth and the Largeware Booths are in operation.

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

D.2.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters, the water wash spray and the dust collector. To monitor the performance of the dry filters, the water wash spray and the dust collector, weekly observations shall be made of the overspray from the surface coating booth stacks (S/V-1, S/V-6, and S/V-7) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with Condition D.2.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Insignificant Activity from Plant #1

- (1) one (1) permitted 6.695 MMBtu per hour natural gas fired boiler exhausting at one (1) stack, identified as S/V-7.

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

D.3.1 Particulate Matter (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the 6.695 MMBtu per hour heat input boiler shall be limited to 0.8 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM or Evansville EPA, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and EVANSVILLE EPA**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Bootz Manufacturing Company
Source Address: 1400 Park Street, Evansville, Indiana 47719 (Plant #1)
2301 Maryland Street, Evansville, Indiana 47719 (Plant #2)
Mailing Address: P.O. Box 6409, Evansville, Indiana 47712
Part 70 Permit No.: T163-6551-00011

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 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT**

**COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

and EVANSVILLE EPA

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Bootz Manufacturing Company
Source Address: 1400 Park Street, Evansville, Indiana 47719 (Plant #1)
2301 Maryland Street, Evansville, Indiana 47719 (Plant #2)
Mailing Address: P.O. Box 6409, Evansville, Indiana 47712
Part 70 Permit No.: T163-6551-00011

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

- 9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
- The Permittee must submit notice in writing within ten (10) calendar days

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 and EVANSVILLE EPA**

**PART 70 OPERATING PERMIT
 SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Bootz Manufacturing Company
 Source Address: 1400 Park Street, Evansville, Indiana 47719 (Plant #1)
 2301 Maryland Street, Evansville, Indiana 47719 (Plant #2)
 Mailing Address: P.O. Box 6409, Evansville, Indiana 47712
 Part 70 Permit No.: T163-6551-00011

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
 Title/Position: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Management
and
Evansville Environmental Protection Agency**

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Bootz Manufacturing Company
Source Location: 1400 Park Street, Evansville, IN 47719 (Plant 1)
2301 Maryland St., Evansville, IN 47719 (Plant 2)
County: Vanderburgh
SIC Code: 3469, 3431
Operation Permit No.: T163-6551-00011
Permit Reviewer: Trish Earls/EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Bootz Manufacturing Company (Plant 1 & 2) relating to the operation of a stationary fabricated metal bath tub, sink, and lavatory manufacturing operation.

Source Definition

This stationary fabricated metal bath tub, sink, and lavatory manufacturing operation consists of two (2) plants:

- (a) Plant 1 is located at 1400 Park Street, Evansville, Indiana 47719; and
- (b) Plant 2 is located at 2301 Maryland Street, Evansville, Indiana 47719.

Since the two (2) plants are located in contiguous properties, 50 % of products from Plant #1 are exchanged to Plant #2, and the two (2) plants are owned by one (1) company, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

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

Plant #1

- (1) One (1) primer paint spray booth, identified as Booth No. 1, utilizing an air atomized application system, coating a maximum of 180 steel parts per hour, with a dry filter and water curtain for overspray control, and exhausting at one (1) stack, identified as S/V-1; and

- (2) One (1) top coat paint spray booth, identified as Booth No. 2, utilizing an air atomized application system, coating a maximum of 180 steel parts per hour, with a dry filter and water curtain for overspray control, and exhausting at one (1) stack, identified as S/V-2.

Plant #2

- (1) Two (2) Largeware Porcelain Enamel booths, the ground coat and the top coat booths, which are capable of coating 165 units per hour. These booths are equipped with eight (8) air atomization spray systems, with water wash spray to control the Particulate Matter (PM) overspray from the ground coat booth and a dust collector to control the PM overspray from the top coat booth, exhausting to stack S/V 7 and 8, respectively;
- (2) One (1) Smallware Porcelain Enamel booth, which is capable of coating 360 units per hour. This booth is equipped with four (4) air atomization spray systems, with dust collector to control the PM overspray, exhausting to stack S/V 6;
- (3) Two (2) Urea Foam spray booths, each capable of coating 7 units per hour. These booths are equipped with an air atomization spray system, with dry filters to control the PM overspray, both exhausting to stack S/V 1; and
- (4) One (1) natural gas-fired Largeware furnace, which is rated at 13.7 million British thermal units per hour (MMBtu/hr) and one (1) natural gas-fired Smallware furnace, which is rated at 4.6 MMBtu/hr.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas fired combustion sources with heat input equal to or less than ten (10) million (MM) British thermal units (Btu) per hour:
 - (a) one (1) 3.0 MMBtu per hour natural gas fired five stage washer exhausting at one (1) stack, identified as S/V-3;
 - (b) one (1) permitted 1.5 MMBtu per hour natural gas fired paint bake oven exhausting at one (1) stack, identified as S/V-4;
 - (c) one (1) 1.0 MMBtu per hour natural gas fired dry off oven exhausting at one (1) stack, identified as S/V-5;
 - (d) one (1) permitted 6.695 MMBtu per hour natural gas fired boiler exhausting at one (1) stack, identified as S/V-7;
- (2) one (1) permitted epoxy resin dip tank exhausting at one (1) stack, identified as S/V-6;
- (3) paved and unpaved roads and parking lots with public access;
- (4) asbestos abatement projects regulated by 326 IAC 14-10;
- (5) filling drums, pails, or other packaging containers with lubricating oils, waxes, and greases; and
- (6) closed loop heating and cooling system.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Certificate of Operation Number 011-001-001, issued by the Evansville EPA on July 11, 1996;
- (b) Certificate of Operation Numbers 011-001-002 and 011-001-004, both issued by the Evansville EPA on July 15, 1996;
- (c) FESOP # 163-6459-00021, issued on December 11, 1996;
- (d) Significant Permit Modification to FESOP # 163-6459-00021, SMF # 163-8330-00021, issued on August 11, 1997;
- (e) Minor Modification to FESOP # 163-6459-00021, MM # 163-8967-00021, issued on April 6, 1998; and
- (f) Second Minor Modification to FESOP # 163-6459-00021, MMF # 163-9410-00021, issued on April 7, 1998.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit 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 Part 70 permit application for the purposes of this review was received on September 11, 1996. Additional information was received on July 28, 1997.

A notice of completeness letter was mailed to Bootz Manufacturing Company on November 12, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (5 pages).

Potential To Emit

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

Pollutant	Potential To Emit (tons/year)
PM	greater than 250
PM-10	greater than 250
SO ₂	less than 100
VOC	greater than 250
CO	less than 100
NO _x	less than 100

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

HAP's	Potential Emissions (tons/year)
Xylene	greater than 10
Toluene	greater than 10
Glycol Ethers	greater than 10
Chromium Compounds	greater than 10
Lead	less than 10
Ethyl Benzene	greater than 10
MDI	less than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10 and VOC 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 to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) 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) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	57.030
PM-10	0.072
SO ₂	0.031
VOC	14.677
CO	1.698
Xylene	8.947
Toluene	2.266
Glycol Ethers	0.955
Chromium Compounds	0.003
Lead	0.000
Ethyl Benzene	0.859
NO _x	0.770

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Plant #1 Paint Booth #1	166.54	166.54	0.00	463.82 *	0.00	0.00	506.36
Plant #1 Paint Booth #2	186.94	186.94	0.00	484.43 *	0.00	0.00	469.45
Plant #2 Urea Foam Spray Booths	24.0	14.0	0.00	0.00	0.00	0.00	1.09 x 10 ⁻⁵
Plant #2 Smallware Booth	107.10	107.10	0.00	0.00	0.00	0.00	0.00
Plant #2 Largeware Booths	469.08*	469.08*	0.00	0.00	0.00	0.00	0.00
Total Emissions**	953.66*	953.66*	0.00	948.25*	0.00	0.00	975.81

* Each of the facilities at Plant #1 have been constructed prior to August 7, 1977, and have not been modified since then. At Plant #2, the Smallware and Largeware Booths have been constructed prior to August 7, 1977, and have not been modified since then. The Urea Foam Booths were constructed in 1992, but controlled PM and PM-10 emissions from this facility are less than the Prevention of Significant Deterioration (PSD) major modification thresholds. Therefore, the requirements of 326 IAC 2-2 do not apply to this source.

** The above emissions are the potential uncontrolled emissions from each facility, except the Urea Foam Spray Booths. The emissions from the Urea Foam Spray Booths represent the maximum allowable PM and PM-10 emissions to avoid the requirements of 326 IAC 2-2 (PSD).

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
PM-10	unclassifiable/attainment
SO ₂	attainment
NO ₂	unclassifiable/attainment
Ozone	attainment (maintenance)
CO	unclassifiable/attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) 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. Vanderburgh County has been designated as maintenance attainment for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

State Rule Applicability - Entire Source

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

This source is not subject to 326 IAC 2-2 (PSD). Each of the facilities at Plant #1 have been constructed prior to August 7, 1977, and have not been modified since then. At Plant #2, the Smallware and Largeware Booths have been constructed prior to August 7, 1977, and have not been modified since then. The Urea Foam Booths were constructed in 1992, but controlled PM and PM-10 emissions from this facility are less than the Prevention of Significant Deterioration (PSD) major modification thresholds. Therefore, the requirements of 326 IAC 2-2 do not apply to this source.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Vanderburgh County and has the potential to emit more than ten (10) tons per year of VOC and NO_x. 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 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity 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) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-1-3.4 (New Source Toxics Control)

The two (2) paint spray booths (Booth 1 and Booth 2) and the Urea Foam Spray Booth are not subject to 326 IAC 2-1-3.4. This rule applies to new or reconstructed facilities with potential emissions of any single HAP equal to or greater than ten (10) tons per year and potential emissions of a combination of HAPs greater than or equal to twenty-five (25) tons per year. The rule does not apply to facilities that have been permitted before the effective date of this rule (July 27, 1997). Since the two (2) paint spray booths (Booth 1 and Booth 2) and the Urea Foam Spray Booths are not new or reconstructed facilities, and have been permitted prior to July 27, 1997, the requirements of 326 IAC 2-1-3.4 do not apply.

326 IAC 6-1 (Nonattainment Area Limitations)

The two (2) paint spray booths (Booth 1 and Booth 2) from Plant #1 and the Urea Foam Spray Booths, Smallware Booth and Largeware Booths from Plant #2 are subject to 326 IAC 6-1-2 (Particulate Emission Limitations). Pursuant to this rule, particulate matter emissions in excess of 0.03 grain per dry standard cubic foot (gr/dscf) shall not be allowed to be discharged into the atmosphere.

- (1) From Plant #1, the particulate matter limitation for Booth 1 and Booth 2 are 4.5 and 7.5 pounds per hour, respectively. The source will comply with this rule by using dry filters and water curtains to limit particulate matter emissions from each of the two (2) paint spray booths to 0.03 gr/dscf. (see Appendix A, page 5 of 5, for detailed calculations).
- (2) From Plant #2, the particulate matter limitation for each of the Urea Foam Spray Booths, Smallware Booth and Largeware Booths is 3.7 pounds per hour. The source will comply with this rule by using dry filters and a dust collector to limit particulate matter emissions from each of the booths to 0.03 gr/dscf. (see Appendix A, page 5 of 5, for detailed calculations).

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

The 6.695 MMBtu per hour boiler is subject to 326 IAC 6-2-3. Pursuant to this rule, particulate emissions from indirect heating facilities existing and in operation before September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

$Q = 3.0 + 1.5 + 1.0 + 6.695 = 12.195 \text{ MMBtu/hr}$
 $C = 50 \text{ ug/m}^3$
 $a = 0.67 \text{ for } Q \text{ less than or equal to } 1,000 \text{ MMBtu/hr}$
 $h = 22.75 \text{ ft}$
 $N = 2$

$$Pt = 1.3 \text{ lb/MMBtu}$$

The allowable particulate emission rate from the 6.695 MMBtu per hour boiler, based on the above equation, is 1.3 pounds per MMBtu heat input. However, pursuant to 326 IAC 6-2-3(d), the allowable PM emission rate from the boiler, existing and in operation before June 8, 1972, is truncated to 0.8 pounds per MMBtu heat input. The 6.695 MMBtu per hour boiler emits less than 0.8 pounds per MMBtu, therefore, it will comply with 326 IAC 6-2-3 (see Appendix A, page 4 of 4 for detailed calculations).

326 IAC 6-3-2 (Process Operations)

- (a) The particulate matter (PM) overspray from the two (2) paint spray booths at Plant #1 shall be limited by the following:

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:

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

The source will comply with 326 IAC 6-3-2 by using dry filters and a water curtain in each of the two (2) paint spray booths to control PM overspray.

- (b) The particulate matter (PM) overspray from the Urea Foam Spray Booths, Smallware Booth and the Largeware Booths at Plant #2 shall be limited by the following:

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:

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

The source will comply with 326 IAC 6-3-2 by using dry filters in the Urea Foam Spray Booths and Largeware Booths and a dust collector in the Smallware Booth to control PM overspray.

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The two (2) paint spray booths (Booth 1 and Booth 2) are not subject to 326 IAC 8-1-6. This rule applies to facilities constructed after January 1, 1980, with potential VOC emissions of 25 tons or more per year. The two (2) paint spray booths (Booth 1 and Booth 2) were each constructed in 1942, therefore, 326 IAC 8-1-6 does not apply.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The two (2) paint spray booths (Booth 1 and Booth 2), each constructed in 1942, are not subject to 326 IAC 8-6. Although they have potential VOC emissions of greater than 100 tons per year, they commenced operation prior to October 7, 1974, therefore, 326 IAC 8-6 does not apply.

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

The two (2) paint spray booths (Booth 1 and Booth 2) are not subject to 326 IAC 8-2-9. Facilities constructed prior to July 1, 1990 are only subject to this rule if they are located in Clark, Floyd, St. Joseph, Elkhart, Lake, Porter, or Marion counties. The two (2) paint spray booths were each constructed in 1942 and are not located in one of the above listed counties, therefore, 326 IAC 8-2-9 does not apply.

There are no other 326 IAC Article 8 rules that apply.

Compliance Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit 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 Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

1. The two (2) paint spray booths (Booth 1 and Booth 2) at Plant #1 and the Urea Foam Spray Booths, Smallware Booth and the Largeware Booths at Plant #2 have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation.
 - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the two (2) paint spray booths (Booth 1 and Booth 2) for Plant #1 and dry filters in the Urea Foam Spray Booths, a dust collector in the Smallware Booth and dry filters in the Largeware Booths must operate properly to ensure compliance with 326 IAC 6-1 (Nonattainment Area Limitations), 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) 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) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations. (Appendix A, page 3 of 5)

Conclusion

The operation of this stationary fabricated metal bath tub, sink, and lavatory manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T163-6551-00011**.

Appendix A: Emission Calculations

Company Name: Bootz Manufacturing Company
Address City IN Zip: 1400 Park Street, Evansville, Indiana 47719 (Plant #1)
 2301 Maryland Street, Evansville, Indiana 47719 (Plant #2)
Operation Permit No.: T163-6551
Plt ID: 163-00011
Reviewer: Trish Earls
Date: October 27, 1998

Total Potential To Emit (tons/year)			
Emissions Generating Activity			
Pollutant	Surface Coating	Natural Gas Combustion	TOTAL
PM	1068.05	1.02	1069.1
PM10	1068.02	1.02	1069.0
SO2	0.00	0.08	0.1
NOx	0.00	13.35	13.4
VOC	948.25	0.73	949.0
CO	0.00	11.22	11.2
total HAPs	975.81	0.00	975.8
worst case single HAP	633.45	0.00	633.5
Total emissions based on rated capacities at 8,760 hours/year.			
**For the purposes of determining Title V applicability, PM10 (not PM) is the regulated pollutant in consideration			
Controlled Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Surface Coating	Natural Gas Combustion	TOTAL
PM	64.59	1.02	65.6
PM10	64.59	1.02	65.6
SO2	0.00	0.08	0.1
NOx	0.00	13.35	13.4
VOC	948.25	0.73	949.0
CO	0.00	11.22	11.2
total HAPs	975.81	0.00	975.8
worst case single HAP	633.45	0.00	633.5
Total emissions based on rated capacities at 8,760 hours/year.			
**For the purposes of determining Title V applicability, PM10 (not PM) is the regulated pollutant in consideration			

**Appendix A: Emission Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Bootz Manufacturing Company
Address City IN Zip: 1400 Park Street, Evansville, Indiana 47719 (Plant #1)
 2301 Maryland Street, Evansville, Indiana 47719 (Plant #2)
Operation Permit No.: T163-6551
Plt ID: 163-00011
Reviewer: Trish Earls
Date: October 27, 1998

Potential Uncontrolled Emissions:																		
Material (as applied)	Process	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency	
PLANT #1																		
Acrylic Epoxy Primer	Booth 1	8.62	48.41%	0.00%	48.41%	0.00%	42.25%	0.095	180	4.2	4.17	71.36	1712.58	312.55	166.54	19.75	50.00%	
Acrylic Epoxy Finish	Booth 2	9.44	47.12%	0.00%	47.12%	0.00%	38.20%	0.095	180	4.4	4.45	76.06	1825.51	333.16	186.94	23.29	50.00%	
Toluene	Booth 1 and 2	7.25	100.00%	0.00%	100.00%	0.00%	0.00%	0.003	180	7.3	7.25	3.92	93.96	17.15	0.00	N/A	100.00%	
Xylene	Booth 1 and 2	7.24	100.00%	0.00%	100.00%	0.00%	0.00%	0.050	180	7.2	7.24	65.16	1563.84	285.40	0.00	N/A	100.00%	
PLANT #2																		
Synron Urea	Urea Foam Spray Booth	9.20	0.00%	0.00%	0.00%	0.00%	100.00%	3.270	7.00	0.0	0.00	0.00	0.00	0.00	138.36	0.00	85.00%	
Frit	Smallware Booth	14.50	30.60%	30.60%	0.00%	53.20%	46.80%	0.045	360.00	0.0	0.00	0.00	0.00	0.00	107.10	0.00	85.00%	
Frit	Largeware Booth	14.50	30.60%	30.60%	0.00%	30.60%	46.80%	0.430	165.00	0.0	0.00	0.00	0.00	0.00	469.08	0.00	85.00%	
Total State Potential Emissions (FOR PLANT #1):												216.50	5195.89	948.25	353.48			
Total State Potential Emissions (FOR PLANT #2):												0.00	0.00	0.00	714.54			

Potential Controlled Emissions:							
	Material Usage Limitation	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
		VOC	PM				
Total Federal Potential Emissions (FOR PLANT #1):	N/A	0.00%	90.00%	216.50	5195.89	948.25	35.35
Total Federal Potential Emissions Urea Foam Spray Booth:	N/A	0.00%	90.00%	0.00	0.00	0.00	13.84
Total Federal Potential Emissions Smallware Booth:	N/A	0.00%	90.00%	0.00	0.00	0.00	10.71
Total Federal Potential Emissions Largeware Booths:	N/A	0.00%	99.00%	0.00	0.00	0.00	4.69
Total Federal Potential Emissions (FOR PLANT #2):				0.00	0.00	0.00	29.24

Note:
 Spray Booth Nos. 1 and 2, each constructed in 1942, are not subject to 326 IAC 8-2-9 since they are located in Vanderburgh County. The booths are also not subject to 326 IAC 2-3 (Emission Offset), since they were constructed prior to August 7, 1980.

Methodology:
 Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency
 Total = Worst Coating + Sum of all solvents used
 Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)

Appendix A: Emission Calculations
HAP Emissions - Potential to Emit

Company Name: Bootz Manufacturing Company
Address City IN Zip: 1400 Park Street, Evansville, Indiana 47719 (Plant #1)
 2301 Maryland Street, Evansville, Indiana 47719 (Plant #2)
Operation Permit No.: T163-6551
Pit ID: 163-00011
Reviewer: Trish Earls
Date: October 27, 1998

Potential To Emit											
Material	Process	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum Production (unit/hr)	Weight % Xylene	Weight % Toluene	Weight % Glycol Ethers	Weight % Chromium Cmpds.	Weight % Lead	Weight % Ethyl Benzene	TOTAL HAPs
					(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
PLANT #1											
Acrylic Epoxy Primer	Booth 1	8.62	0.095	180	20.00%	20.00%	5.00%	5.00%	0.00%	5.00%	
					129.12	129.12	32.28	32.28	0.00	32.28	355.09
Acrylic Epoxy Finish	Booth 2	9.44	0.095	180	35.00%	2.00%	5.00%	2.00%	1.00%	0.00%	
					247.46	14.14	35.35	14.14	7.07	0.00	318.17
Toluene	Booths 1 & 2	7.25	0.003	180	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	
					0.00	17.15	0.00	0.00	0.00	0.00	17.15
Xylene	Booths 1 & 2	7.24	0.050	180	90.00%	0.00%	0.00%	0.00%	0.00%	10.00%	
					256.86	0.00	0.00	0.00	0.00	28.54	285.40
					633.45	160.41	67.63	46.42	7.07	60.82	975.81

Methodology:

HAPs emission rate (tons/yr) = density (lb/gal) * (gal/unit) * (units/hour) * weight % HAP * (8,760 hrs/yr) * (1 ton/2,000 lb)

PLANT #2

Using the Society of Plastics Industry method of MDI estimations (taken from SMF # 163-8330-00021)
 Methylene Diphenyl Diisocyanate (MDI) from Syniron Urea:

$$W = [25.4 * Pt * Mt * (u^{0.78}) * A]/T$$

where:

W = evaporation rate of MDI (gram/sec) = 6.75E-03 gr/sec
 Pt = liquid vapor pressure (atm.) = 1.80E-04 atm.
 Mt = average molecular wt. = 250 for MDI
 T = temp. (Kelvin) = 343 Kelvin
 u = airflow (m/sec.) = 0.66 m/sec
 A = area exposed (sq. meters) = 2.80 ft²

Given: fan capacity = 19,000 cfm
 Area of booth = 145.7 ft²

$$u = \frac{19,000}{145.7} \frac{*1 \text{ min}}{60 \text{ sec}} \frac{*1 \text{ m}}{3.28 \text{ ft}} = 0.66 \text{ m/sec}$$

Temperature T = 158 deg. F = 343 deg. K
 Vapor Pressure of MDI at 70 deg. C = 1.40E-01 mm Hg

$$Pt = \frac{1.40E-01 \text{ mm Hg}}{760} = 1.84E-04$$

Area Exposed = $\frac{30.5 \text{ ft}^2 * 1 \text{ m}^2}{10.7 \text{ ft}^2} = 2.85 \text{ ft}^2$

Bath Tub Mold: MDI per mold/tub = (6.75*10⁻³ gr/sec) * (10sec/mold) * (1 lb/454gr)
 = 1.50E-06 lb/tub

Total MDI Emission = (1.5*10⁻⁶ lb/tub) * (40 tubs/day) * (365 days/yr) * (1 ton/2000 lb)
 = 1.09E-05 ton/yr

**Appendix A: Emission Calculations
Natural Gas Combustion
MM Btu/hr 0.3 - < 100**

Company Name: Bootz Manufacturing Company
Address City IN Zip: 1400 Park Street, Evansville, Indiana 47719 (Plant #1)
2301 Maryland Street, Evansville, Indiana 47719 (Plant #2)
CP: T163-6551
Plt ID: 163-00011
Reviewer: Trish Earls
Date: October 27, 1998

	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
from Plant #1	12.2	106.9
Largeware Furnace	13.7	120.0
Smallware Furnace	4.6	40.3

Heat Input Capacity includes:

Plant #1: one (1) 3.0 MMBtu/hr five stage washer, one (1) 1.5 MMBtu/hr paint bake oven, one (1) 1.0 MMBtu/hr dry off oven, and one (1) 6.695 MMBtu/hr boiler.

Emission Factor in lb/MMCF	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr						
Plant 1	0.41	0.41	0.03	5.34	0.29	4.49
Largeware Furnace	0.46	0.46	0.04	6.00	0.33	5.04
Smallware Furnace	0.15	0.15	0.01	2.01	0.11	1.69

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 50, Flue gas recirculation = 32

All PM is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors may be used to estimate PM10, PM2.5, and PM1 emissions.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Compliance with 326 IAC 6-2-3

Plant #1

The following calculations demonstrates compliance of the 6.695 MMBtu/hr boiler with the allowable PM emission limit of 0.8 lb/MMBtu pursuant to 326 IAC 6-2-3.

Potential PM emission rate	0.35 ton/yr /	4.38 lb/hr / ton/yr /	6.7 MMBtu/hr
=	0.01 lb PM/MMBtu	WILL COMPLY	

**Appendix A: Emission Calculations
Miscellaneous Information**

Company Name: Bootz Manufacturing Company
Address City IN Zip: 1400 Park Street, Evansville, Indiana 47719 (Plant #1)
 2301 Maryland Street, Evansville, Indiana 47719 (Plant #2)
Operation Permit No.: T163-6551
Plt ID: 163-00011
Reviewer: Trish Earls
Date: October 27, 1998

326 IAC 6-1-2 (Particulate Emission Limitations) Compliance Calculations

The following calculations determine compliance with 326 IAC 6-1-2, which limits stack emissions from each paint spray booth to 0.03 gr/dscf.

Booth #1

16.65 ton/yr *	2000 lb/ton *	7000 gr/lb =	0.025 gr/dscf	(will comply)
525,600 min/yr *	17,430 dscf/min			

Note:

$$\begin{aligned} \text{SCFM} &= 18,000 \text{ acfm} * (460 + 60) / (460 + 77) \\ &= 17,430 \text{ scfm} \end{aligned}$$

Booth #2

18.69 ton/yr *	2000 lb/ton *	7000 gr/lb =	0.017 gr/dscf	(will comply)
525,600 min/yr *	29,050 dscf/min			

Note:

$$\begin{aligned} \text{SCFM} &= 30,000 \text{ acfm} * (460 + 60) / (460 + 77) \\ &= 29,050 \text{ scfm} \end{aligned}$$

Urea Foam Spray Booth

13.84 ton/yr *	2000 lb/ton *	7000 gr/lb =	0.025 gr/dscf	(will comply)
525,600 min/yr *	14,525 dscf/min			

Note:

$$\begin{aligned} \text{SCFM} &= 15,000 \text{ acfm} * (460 + 60) / (460 + 77) \\ &= 14,525 \text{ scfm} \end{aligned}$$

Smallware Booth

10.71 ton/yr *	2000 lb/ton *	7000 gr/lb =	0.020 gr/dscf	(will comply)
525,600 min/yr *	14,525 dscf/min			

Note:

$$\begin{aligned} \text{SCFM} &= 15,000 \text{ acfm} * (460 + 60) / (460 + 77) \\ &= 14,525 \text{ scfm} \end{aligned}$$

Largeware Booths

4.69 ton/yr *	2000 lb/ton *	7000 gr/lb =	0.009 gr/dscf	(will comply)
525,600 min/yr *	14,525 dscf/min			

Note:

$$\begin{aligned} \text{SCFM} &= 15,000 \text{ acfm} * (460 + 60) / (460 + 77) \\ &= 14,525 \text{ scfm} \end{aligned}$$

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Bootz Manufacturing Company
Source Location: 1400 Park Street, Evansville, IN 47719 (Plant 1)
2301 Maryland St., Evansville, IN 47719 (Plant 2)
County: Vanderburgh
SIC Code: 3469, 3431
Operation Permit No.: T163-6551-00011
Permit Reviewer: Trish Earls/EVP

On April 15, 1999, the Office of Air Management (OAM) had a notice published in the Evansville Courier, Evansville, Indiana, stating that Bootz Manufacturing Company had applied for a Part 70 Operating Permit to operate a stationary fabricated metal bath tub, sink, and lavatory manufacturing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit 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 permit should be issued as proposed.

On May 11, 1999, Thomas Bootz submitted comments on behalf of Bootz Manufacturing Company on the proposed Part 70 permit. The summary of the comments and responses is as follows:

Comment #1

There are no dry filters associated with the primer paint spray booth, identified as Booth #1, in Plant #1. Please change the description for this booth, as listed in section A.2 of the Part 70 permit, so that there is no reference to dry filters.

Response #1

The emission unit description listed as item (a) under Plant #1 in section A.2 and section D.1 of the Part 70 permit has been changed as follows (changes in ~~strikeout~~):

- (a) One (1) primer paint spray booth, identified as Booth No. 1, utilizing an air atomized application system, coating a maximum of 180 steel parts per hour, with a ~~dry filter and~~ water curtain for overspray control, and exhausting at one (1) stack, identified as S/V-1; and

The emission unit description for this booth listed on page 1 of the Technical Support Document (TSD) is also revised as shown above. This change did not result in a change in controlled PM emissions from this booth because the water curtain alone still maintains a 90% control efficiency. Condition D.1.6 of the Part 70 permit has been revised to also require the water curtains to be in operation when the two (2) paint booths (Booth #1 and Booth #2) are in operation as follows (changes in bold):

D.1.6 Particulate Matter (PM)

The **water curtain for PM control in the paint booth identified as Booth #1, and the dry filters and water curtain for PM control in the paint booth identified as Booth #2**, shall be in operation at all times when the two (2) paint booths (Booth #1 and Booth #2) are in operation.

Condition D.1.7 of the Part 70 permit is now revised to include compliance monitoring of the water curtains as follows (changes in bold):

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters **in Booth #2 and to verify that the water flow rate of the water curtains in Booths #1 and #2 meet the manufacturer's recommended level.** To monitor the performance of the dry filters **and water curtains**, weekly observations shall be made of the overspray from the surface coating booth stacks (S/V-1 and S/V-2) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Comment #2

Stack No. 8 has been eliminated from Plant #2. Please change the emission unit description for the two (2) Largeware Porcelain Enamel booths as listed in section A.2 under Plant #2 to reflect this.

Response #2

The emission unit description listed as item (a) under Plant #2 in section A.2 and section D.2 of the Part 70 permit has been changed as follows (changes in bold or strikeout):

- (a) Two (2) Largeware Porcelain Enamel booths, the ground coat and the top coat booths, which are capable of coating 165 units per hour. These booths are equipped with eight (8) air atomization spray systems, with water wash spray to control the Particulate Matter (PM) overspray from the ground coat booth and a dust collector to control the PM overspray from the top coat booth, **both** exhausting to stack S/V ~~7 and 8, respectively~~;

The emission unit description for these booths listed on page 2 of the Technical Support Document (TSD) is also revised as shown above. Also, condition D.2.7 of the Part 70 permit is now revised as follows (changes in bold or strikeout):

D.2.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters, the water wash spray and the dust collector. To monitor the performance of the dry filters, the water wash spray and the dust collector, weekly observations shall be made of the overspray from the surface coating booth stacks (S/V-1, S/V-6, **and S/V-7;** ~~and S/V-8~~) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Comment #3

One of the Urea Foam spray booths in Plant #2 was taken offline as of May 7, 1999. Please change the emission unit description to reflect that there is only one Urea Foam spray booth.

Response #3

The emission unit description listed as item (c) under Plant #2 in section A.2 and section D.2 of the Part 70 permit has been changed as follows (changes in bold or strikeout):

- (c) ~~Two (2)~~ **One (1)** Urea Foam spray booths, ~~each~~ capable of coating 7 units per hour. ~~These~~ **This** booth ~~are~~ **is** equipped with an air atomization spray system, with dry filters to control the PM over spray, ~~both~~ exhausting to stack S/V 1; and

The emission unit description for this booth listed on page 2 of the Technical Support Document (TSD) is also revised as shown above. Also, condition D.2.1 of the Part 70 permit is now revised as follows (changes in bold or strikeout):

D.2.1 Particulate Matter (PM) and Particulate Matter Less Than 10 Microns (PM-10) [326 IAC 2-2]

Total PM and PM-10 emissions from the ~~two (2)~~ **one (1)** Urea Foam spray booths shall be limited to less than 25 and 15 tons per year, respectively, therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

The emission calculations have not been revised as a result of this change.

On May 19, 1999, Scott Anslinger of the IDEM Southwest Regional Office submitted comments on the proposed Part 70 permit. The summary of the comments and responses is as follows:

Comment #1

In condition C.3 of the Part 70 permit regarding open burning, Evansville EPA normally requests that the rule cite MCE 3.30.18.214 be added to the condition. Please add the sentence "MCE 3.30.18.214 is a locally enforceable provision." to the condition.

Response #1

Condition C.3 of the Part 70 permit is revised to read as follows (changes in bold):

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. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable. **MCE 3.30.18.214 is a locally enforceable provision.**

Comment #2

In condition C.5 of the Part 70 permit regarding fugitive dust emissions, Evansville EPA normally requests that the rule cite MCE 3.30.18.212 be added to the condition. Please add the sentence "MCE 3.30.18.212 is a locally enforceable provision." to the condition.

Response #2

Condition C.5 of the Part 70 permit is revised to read as follows (changes in bold):

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable. **MCE 3.30.18.212 is a locally enforceable provision.**

Comment #3

Condition D.1.1 states that this facility is not required to comply with 326 IAC 8-1-6 and 8-2-9. Is this correct? Although the rules did not commence until July 1, 1991, there is no stipulation which exempts sources constructed prior to July 1, 1991 from complying. Especially since subpart (d) specifically mandates that "No owner or operator of a facility engaged in surface coating of miscellaneous metal parts and products may cause, allow or permit the discharge into the atmosphere of any volatile organic compound in excess of the following:"

Response #3

While there is no stipulation in 326 IAC 8-1-6 or 8-2-9 which specifically exempts sources constructed prior to July 1, 1991, the rules do specify which facilities are subject to the rule. 326 IAC 8-1-6 states that new facilities, as of January 1, 1980, must comply with the rule, therefore, facilities in existence prior to January 1, 1980 would not have to comply with the rule. 326 IAC 8-2-1 contains the applicability criteria for all the rules containing surface coating emission limitations (326 IAC 8-2-2 through 8-2-13). Pursuant to 326 IAC 8-2-1, facilities constructed prior to November 1, 1980 or prior to July 1, 1990 are only subject to 326 IAC 8-2-9 if they are located in Clark, Floyd, St. Joseph, Elkhart, Lake, Porter, or Marion counties. The two (2) paint spray booths were each constructed in 1942 and are not located in one of the above listed counties, therefore, 326 IAC 8-2-9 does not apply.