

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Talbert Manufacturing, Inc.
1628 West State Road 114
Rensselaer, Indiana 47978**

(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 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 073-6926-00025	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). 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 truck trailer manufacturing source.

Responsible Official: Rick L. Odle
Source Address: 1628 West State Road 114, Rensselaer, Indiana 47978
Mailing Address: RR 5 Box 195, Rensselaer, Indiana 47978
SIC Code: 3715
County Location: Jasper
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:

- (a) One (1) shot blast facility, identified as (P6), usually using staurolite, sand, granulated coal combustion by-product, or steel shot as an abrasive, with a nozzle internal diameter of 0.375 inches and a nozzle pressure of 90 pounds per square inch gauge, with a blast shed settling chamber as control and exhausting to stack (S4), capacity: 1,532 pounds of shot blast media per hour.
- (b) One (1) surface coating booth, identified as (P7), equipped with four (4) air assisted airless spray guns and three (3) cup guns with dry filters as overspray controls and exhausting to stacks (S5, S6, and S7), total maximum capacity of spray guns: 76.0 gallons of coating per hour.

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 British thermal units per hour. One (1) natural gas-fired boiler, identified as (P5), with a maximum heat input capacity of 3.35 million British thermal units per hour and exhausting to stack (S3), three (3) forced air units, and ten (10) radiant heaters. Total heat input capacity of all combustion units is 5.65 million British thermal units per hour.

- (b) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs and less than 5 pounds per hour of PM:
 - (1) One (1) plasma arc cutting table, identified as (P1), equipped with four (4) plasma arc cutting torches, two (2) torches operating at 50 amperes and two (2) torches operating at 150 amperes, with a maximum total cutting speed of 120 inches per minute and exhausting to stack (S1).
 - (2) One (1) gas metal arc welding facility, identified as (P2), equipped with thirty-four (34) gas metal arc welding units with a maximum total electrode usage rate of 62.9 pounds per hour and exhausting to stack (S2).
 - (3) One (1) submerged arc welding facility, identified as (P3), equipped with two (2) submerged arc welding units with a maximum total electrode usage rate of 6.67 pounds per hour and exhausting to stack (S2).
 - (4) One (1) shielded metal arc welding facility, identified as (P4), equipped with one (1) shielded metal arc welding unit with a maximum electrode usage rate of 7.14 pounds per hour and exhausting to stack (S2).
- (c) Woodworking operations (two (2) table saws, one (1) radial arm saw) with less than 5 pounds per hour of PM emissions.

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);
- (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 [326 IAC 2-1-10] [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 2-1-3.2 or 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.

(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.

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

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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, 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, 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) 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 July 1 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

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, 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, 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]

- (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

- (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 shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

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, 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

- (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

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, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, 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, 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, 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, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

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, 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, 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, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, 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 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

- (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, on or before the date it is due. [326 IAC 2-5-3]

- (2) If IDEM, OAM, 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,, 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, 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, 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

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

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, 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, 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, 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, nor an authorized representative, may disclose the information unless and until IDEM, OAM, 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, and IDEM, OAM, 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 Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. 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) IDEM, OAM, shall reserve the right to issue a new permit.

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, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM 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), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.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.
- 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.
- 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

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). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, ~~prior to a renovation/demolition, to 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

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 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 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

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.

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

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, 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, 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 in a process in more than the 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, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, 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 upon request and shall be subject to review and approval by IDEM, OAM. 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 July 1 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 January 1 and ending December 31. 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

- (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, 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 times when 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 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, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner 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.
- (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
- (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, 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.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

- (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.

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).

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)]

- (a) One (1) shot blast facility, identified as (P6), usually using staurolite, sand, granulated coal combustion by-product, or steel shot as an abrasive, with a nozzle internal diameter of 0.375 inches and a nozzle pressure of 90 pounds per square inch gauge, with a blast shed settling chamber as control and exhausting to stack (S4), capacity: 1,532 pounds of shot blast media per hour.

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

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the shot blast facility shall not exceed 3.43 pounds per hour equivalent to 15.0 tons per year, when operating at a process weight rate of 1,532 pounds per hour.

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

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

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

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Particulate Matter (PM)

All shot blasting shall take place in the sixty-five (65) foot length by twenty-four (24) foot width by nine (9) foot depth settling chamber.

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

D.1.5 Visible Emissions Notations

- (a) Daily inspections shall be performed to verify that the settling chamber is operating properly. The doors, walls and ceiling shall be inspected to ensure that the chamber is enclosed with doors closing completely and no cracks and/or holes in the walls ceilings and doors.
- (b) Daily visible emission notations of the shot blast stack (S4) exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (f) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of daily inspections, daily visible emission notations of the shot blast stack (S4) exhaust 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)]

- (b) One (1) surface coating booth, identified as (P7), equipped with four (4) air assisted airless spray guns and three (3) cup guns with dry filters as overspray controls and exhausting to stacks (S5, S6, and S7), total maximum capacity of spray guns: 76.0 gallons of coating per hour.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the surface coating facility 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 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.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.4 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the surface coating facility (P7) is in operation and exhausting to the outside atmosphere.

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

D.2.5 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S5, S6, S7) while the booth is 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 an overspray emission, evidence of overspray emission, or other abnormal 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.2.6 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain a log of weekly overspray observations of the surface coating booth stacks, 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 Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour. One (1) natural gas-fired boiler, identified as (P5), with a maximum heat input capacity of 3.35 million British thermal units per hour and exhausting to stack (S3), three (3) forced air units, and ten (10) radiant heaters. Total heat input capacity of all combustion units is 5.65 million British thermal units per hour.
- (b) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs and less than 5 pounds per hour of PM:
 - (1) One (1) plasma arc cutting table, identified as (P1), equipped with four (4) plasma arc cutting torches, two (2) torches operating at 50 amperes and two (2) torches operating at 150 amperes, with a maximum total cutting speed of 120 inches per minute and exhausting to stack (S1).
 - (2) One (1) gas metal arc welding facility, identified as (P2), equipped with thirty-four (34) gas metal arc welding units with a maximum total electrode usage rate of 62.9 pounds per hour and exhausting to stack (S2).
 - (3) One (1) submerged arc welding facility, identified as (P3), equipped with two (2) submerged arc welding units with a maximum total electrode usage rate of 6.67 pounds per hour and exhausting to stack (S2).
 - (4) One (1) shielded metal arc welding facility, identified as (P4), equipped with one (1) shielded metal arc welding unit with a maximum electrode usage rate of 7.14 pounds per hour and exhausting to stack (S2).
- (c) Woodworking operations (2 table saws, radial arm saw) with less than 5 pounds per hour of PM emissions.

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

D.3.1 Particulate Matter (PM)

- (a) Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 3.35 million British thermal unit per hour heat input boiler shall be limited to 0.6 pounds per million British thermal unit heat input. This limit is the maximum allowable emissions for a boiler constructed between June 2, 1972 and September 21, 1983 pursuant to 326 IAC 6-2-3 (e) and is less than the calculated limitation based on the following equation:

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

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 million British thermal units per hour heat input.

h = Stack height in feet. If a number of stacks of different heights exist, the average stack height will be computed using a weighted average of stack heights.

- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the plasma arc cutting facility, the welding facilities, and the woodworking facilities shall each not exceed allowable PM emission rates based on the following equation:

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

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

Compliance Determination Requirement

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

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, 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**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Talbert Manufacturing, Inc.
Source Address: 1628 West State Road 114, Rensselaer, Indiana 47978
Mailing Address: RR 5 Box 195, Rensselaer, Indiana 47978
Part 70 Permit No.: T 073-6926-00025

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**

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

Source Name: Talbert Manufacturing, Inc.
 Source Address: 1628 West State Road 114, Rensselaer, Indiana 47978
 Mailing Address: RR 5 Box 195, Rensselaer, Indiana 47978
 Part 70 Permit No.: T 073-6926-00025

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".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 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
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

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

Source Name: Talbert Manufacturing, Inc.
Source Address: 1628 West State Road 114, Rensselaer, Indiana 47978
Mailing Address: RR 5 Box 195, Rensselaer, Indiana 47978
Part 70 Permit No.: T 073-6926-00025

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)
C 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
C 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)
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

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

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

Source Background and Description

Source Name: Talbert Manufacturing, Inc.
Source Location: 1628 West State Road 114, Rensselaer, Indiana 47978
County: Jasper
SIC Code: 3715
Operation Permit No.: T 073-6926-00025
Permit Reviewer: CarrieAnn Ortolani

The Office of Air Management (OAM) has reviewed a Part 70 Permit application from Talbert Manufacturing, Inc. relating to the operation of a truck trailer manufacturing source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) shot blast facility, identified as (P6), using staurolite as an abrasive, with a nozzle internal diameter of 0.375 inches and a nozzle pressure of 90 pounds per square inch gauge, with a blast shed settling chamber as control and exhausting to stack (S4), capacity: 1,532 pounds of staurolite per hour.
- (b) One (1) surface coating booth, identified as (P7), equipped with four (4) air assisted airless spray guns and three (3) cup guns with dry filters as overspray controls and exhausting to stacks (S5, S6, and S7), total maximum capacity of spray guns: 76.0 gallons of coating per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

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

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

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour. Three (3) forced air units, ten (10) radiant heaters, and one (1) natural gas-fired boiler, identified as (P5), with a maximum heat input capacity of 3.35 million British thermal units per hour and exhausting to stack (S3). Total heat input capacity of all combustion units is 5.65 million British thermal units per hour.
- (b) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.

- (c) Combustion source flame safety purging on startup.
- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (f) The following VOC and HAP storage containers: storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons; vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (g) Equipment used exclusively for packaging lubricants and greases.
- (h) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (i) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (j) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (k) Cleaners and solvents characterized as follows: having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38 degrees Celsius (100 degrees Fahrenheit); or having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20 degrees Celsius (68 degrees Fahrenheit); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (l) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility.
- (m) Any operation using aqueous solutions containing less than 1 percent by weight of VOC excluding HAPs.
- (n) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (o) Paved and unpaved roads and parking lots with public access.
- (p) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (q) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

- (r) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (s) On-site fire and emergency response training approved by the department.
- (t) Filter or coalescer media changeout.
- (u) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs and less than 5 pounds per hour of PM:
 - (1) One (1) plasma arc cutting table, identified as (P1), equipped with four (4) plasma arc cutting torches, two (2) torches operating at 50 amperes and two (2) torches operating at 150 amperes, with a maximum total cutting speed of 120 inches per minute and exhausting to stack (S1).
 - (2) One (1) gas metal arc welding facility, identified as (P2), equipped with thirty-four (34) gas metal arc welding units with a maximum total electrode usage rate of 62.9 pounds per hour and exhausting to stack (S2).
 - (3) One (1) submerged arc welding facility, identified as (P3), equipped with two (2) submerged arc welding units with a maximum total electrode usage rate of 6.67 pounds per hour and exhausting to stack (S2).
 - (4) One (1) shielded metal arc welding facility, identified as (P4), equipped with one (1) shielded metal arc welding unit with a maximum electrode usage rate of 7.14 pounds per hour and exhausting to stack (S2).
- (v) Woodworking operations (two (2) table saws, one (1) radial arm saw) with less than 5 pounds per hour of PM emissions.

Existing Approvals

The source has been operating under the following approval:

CP 073-4604-00025, issued on October 20, 1995.

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 October 15, 1996. Additional information was received on August 13, 1997 via facsimile and

August 15, 1997 via telephone. A notice of completeness letter was mailed to the source on October 29, 1996.

Emission Calculations

See pages 1 through 5 of Appendix A of this document for detailed emissions calculations.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	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
Formaldehyde	greater than 10
MIBK	greater than 10
MEK	greater than 10
Cumene	greater than 10
Chromium Compounds	greater than 10
Glycol Ethers	greater than 10
Hexamethylene Diisocyanate	greater than 10
Methanol	greater than 10

Cobalt	less than 10
Manganese	less than 10
Nickel	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in the Indiana Rule) of VOC and PM₁₀ are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the 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 source's 1995 emission data indicated in the application. This is not the data from the OAM Emission Reporting Inventory, since there is no emission listing for this source at the present time.

Pollutant	Actual Emissions (tons/year)
PM	1.79
PM-10	1.77
SO ₂	0.00237
VOC	30.9
CO	0.083
NO _x	0.395
Chromium Compounds	0.00197
Cobalt Compounds	0.00032
Manganese Compounds	0.05949
Nickel	0.00053
Toluene	2.28
Xylene	5.40
MIBK	2.03
MEK	0.051
Formaldehyde	0.0000551
Methanol	0.0510
Cumene	0.0700

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the emission units.

Process/ facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Shot blasting	0.275 (15.0)	0.193 (10.5)	0	0	0	0	0
Surface Coating	1.10	1.10	0	2,393	0	0	3,727
Plasma Arc Cutting (insignificant)	7.76	7.76	0	0.042	0	0	0.042
Welding (insignificant)	9.19	9.19	0	1.45	0	0	1.45
Boiler (insignificant)	0.176 (8.80)	0.176 (8.80)	0.009	0.078	0.308	1.47	0.0
Additional Insignificant Activities	2.0	1.00	0.100	1.00	0.500	1.00	1.0
Total Emissions	21.5 (43.9)	19.8 (38.4)	0.109	2,396	0.808	2.47	3,729

- (a) The values in the table represent potential emissions after controls. The values in parenthesis represent the emission limitation based on applicable rules.
- (b) The PM emission limitations are based on 326 IAC 6-2-3 (PM limitations for sources of indirect heating) and 326 IAC 6-3-2 (Process Operations).
- (c) The surface coating and the insignificant activities of welding, plasma cutting and wood-working are also subject to the requirements of 326 IAC 6-3-2 (Process Operations). A constant PM limitation can not be computed for those facilities due to the variable process weight rate.
- (d) All facilities, except the boiler and shot blasting facilities, were constructed prior to August 7, 1977. The facilities constructed prior to August 7, 1977 have allowable VOC emissions greater than 250 tons per year. Therefore, the source is a major PSD source pursuant to 326 IAC 2-2, but the source is not required to obtain a PSD permit for facilities constructed prior to August 7, 1977. The boiler and shot blasting facilities constructed after August 7, 1977 have potential emissions less than that which would constitute a major modification to an existing major source pursuant to 326 IAC 2-2, PSD.
- (e) Attached Tables 1 and 2 summarize the permit conditions and requirements.

County Attainment Status

The source is located in Jasper County.

Pollutant	Status
TSP	attainment
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Jasper County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 Permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2 -2(PSD)

All facilities, except the boiler and shot blasting facilities, were constructed prior to August 7, 1977. The facilities constructed prior to August 7, 1977 have allowable VOC emissions greater than 250 tons per year. Therefore, the source is a major PSD source pursuant to 326 IAC 2-2, but the source is not required to obtain a PSD permit for facilities constructed prior to August 7, 1977. The boiler and shot blasting facilities constructed after August 7, 1977 have potential emissions less than that which would constitute a major modification to an existing major source pursuant to 326 IAC 2-2, PSD.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than 100 tons per year of VOC. 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 July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

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

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-2-3 (PM limitations for sources of indirect heating)

Pursuant to CP 073-4604-00025, issued October 20, 1995, the 3.35 million British thermal units per hour/hr boiler constructed in 1979 shall be limited to 4.42 pounds of PM per million British thermal units. This limit is greater than the maximum allowable limit pursuant to 326 IAC 6-2-3 (e) of 0.6 pounds per million British thermal units. Therefore, the boiler shall be limited to PM emissions of no more than 0.6 pounds per million British thermal units, equivalent to maximum allowable emissions of 8.80 tons per year. Since potential PM emissions from the boiler are 0.012 pounds per million British thermal units, equivalent to potential emissions of 0.176 tons per year, the boiler will comply with this rule. See page 5 of TSD Appendix A for detailed calculations.

326 IAC 6-3-2 (Process Operations)

- (a) The particulate matter (PM) emissions from the shot blasting facility be limited to 3.43 pounds per hour, equivalent to 15.0 tons per year for a process weight rate of 1,532 pounds per hour. Since potential PM emissions after control by the settling chamber from the shot blasting facility are 0.275 tons per year, the shot blasting facility will comply with this rule. Compliance will be demonstrated by all shot blasting being done in the shot blasting settling chamber with all doors closed.

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

$$E = 4.10 (0.766 \text{ tons/hr})^{0.67} = 3.43 \text{ pounds per hour.}$$

- (b) The particulate matter (PM) overspray from the surface coating facility 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:

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

Compliance will be demonstrated by operating dry filters at all times when the surface coating facility is in operation.

- (c) The particulate matter (PM) emissions from the insignificant activities of plasma arc cutting, welding and woodworking shall each 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:

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

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

Since the surface coating facility was constructed prior to November 1, 1980 in Jasper County, this rule does not apply.

326 IAC 8-6-1 (Organic Solvent Emission Limitations)

Since the surface coating facility was in operation prior to October 7, 1974 in Jasper County, this rule does not apply.

326 IAC 8-1-6 (BACT)

Since the surface coating facility was constructed prior to January 1, 1980, this rule does not apply. No other 326 IAC 8 rules apply to the surface coating facility.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

Since the insignificant degreasing operations were in operation before January 1, 1980 in Jasper County, this rule does not apply. No other 326 IAC 8 rules 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 permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

The shot blasting facility has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emissions notations of the shot blasting stack (S4) exhaust shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
- (b) Daily inspections shall be performed to verify that the settling chamber is operating properly. The doors, walls and ceiling shall be inspected to ensure that the chamber is enclosed with doors closing completely and no cracks and/or holes in the walls, ceiling and doors.

These conditions are necessary to ensure compliance with 326 IAC 6-3-2 (Process Operations) and 326 IAC 2-7 (Part 70).

The surface coating operation has 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, daily observations shall be made of the overspray while the surface coating facility is in operation.
- (b) Weekly inspections shall be performed of the coating emissions from the stacks (S5, S6, and S7) and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.

These conditions are necessary to ensure compliance with 326 IAC 6-3-2 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) 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 Clean Air Act.
- (b) See pages 3 and 4 of TSD Appendix A for detailed air toxic calculations.
- (c) The requirements of 326 IAC 2-1-3.4 (New Source Toxic Control) do not apply to this existing permitted source.

Conclusion

The operation of this truck trailer manufacturing source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 073-6926-00025**.

Table 1

Description of facility: Shot Blasting facility
Max Rating: 1,532 pounds of raw material per hour
Construction Date: 1994
Control Device: Settling Chamber
Stack/Vent ID: S4

Facility class: 099 **Description:** Shot Blasting

EMISSION LIMITATIONS		
Numerical Emission Limit:	15.0 tons per year of PM	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:	All shot blasting done in the settling chamber	
PERFORMANCE TESTING		
	N/A	
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	Visible Emission Notations & settling chamber inspections	
Monitoring Method:	Visual	
Monitoring Regulation/Citation:	326 IAC 2-7-6(1) & 2-7-5(1)	
Monitoring Frequency:	Daily	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Visible Emission Notations	
Recording Frequency:	Daily	
REPORTING REQUIREMENTS		
Information in Report:	Summary of deviations	
Reporting Frequency/Submittal:	As necessary within 10 days of discovery of deviation	
Additional Comments:		

Table 2

Description of facility: Surface Coating facility
Max Rating: Total of 76.0 gallons of coating material per hour. (Based on gun capacity)
Construction Date: 1957
Control Device: dry filters
Stack/Vent ID: S5, S6 and S7

Facility class: 01 **Description:** Surface Coating

EMISSION LIMITATIONS		
Numerical Emission Limit:	PM	
Regulation/Citation:	326 IAC 6-3-2	
Compliance Demonstration:	Operate dry filters	
PERFORMANCE TESTING		
	N/A	
Parameter/Pollutant to be Tested:		
Testing Method/Analysis:		
Testing Frequency/Schedule:		
Submittal of Test Results:		
COMPLIANCE MONITORING		
Monitoring Description:	Inspect dry filters & overspray observations	
Monitoring Method:	Visual	
Monitoring Regulation/Citation:	326 IAC 2-7-6(1) & 2-7-5(1)	
Monitoring Frequency:	Daily & Weekly	
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	PM overspray	
Recording Frequency:	Daily	
REPORTING REQUIREMENTS		
Information in Report:	Summary of deviations	
Reporting Frequency/Submittal:	As necessary within 10 days of discovery of deviation	
Additional Comments:		

Indiana Department of Environmental Management Office of Air Management

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

Source Name: Talbert Manufacturing, Inc.
 Source Location: 1628 West State Road 114, Rensselaer, Indiana 47978
 County: Jasper
 Part 70 Operating Permit: T 073-6926-00025
 SIC Code: 3715
 Permit Reviewer: CarrieAnn Ortolani

On November 14, 1997, the Office of Air Management (OAM) had a notice published in the Rensselaer Republican, Rensselaer, Indiana, stating that Talbert Manufacturing, Inc. had applied for a Part 70 Operating Permit to operate a truck trailer manufacturing source with dry filters as overspray control. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating 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 Part 70 Operating Permit should be issued as proposed.

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

1. The Cover Page has been revised as follows:

Issued by:
~~Felicia R. George~~ **Janet G. McCabe**, Assistant Commissioner
 Office of Air Management

2. The page numbers have been removed from the table of contents since the condition numbers are sufficient to identify the location of each condition.
3. Section A (Source Summary) has been changed as follows:

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 presented in the permit application.~~ **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.**

4. Condition A.5 (Prior Permit Conditions Superseded) has been deleted. Language has been added to Condition B.14 (Permit Shield) to address the effect of prior permit conditions.

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

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

5. Condition B.1 (Permit No Defense) part (b) of the condition has been changed as follows:
- (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 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**
6. Condition B.8 (Duty to Supplement and Provide Information) part (c) of the condition has been changed as follows:
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, 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, For information claimed to be confidential, the Permittee must shall furnish such records to IDEM, OAM, 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 shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**
7. Condition B.11 (Annual Compliance Certification) part (a) has been changed to the following:
- (a) The Permittee shall annually ~~certify that the source has complied~~ **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

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

8. Condition B.11 (Annual Compliance Certification) part (c) has been changed to the following:

(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); ~~and~~
- (5) Any insignificant activity that has been added without a permit revision; and**
- ~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

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

9. Condition B.12 (Preventive Maintenance Plan) has been changed as follows:

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]

-
- (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 units and associated~~ 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**

- (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, upon request and shall be subject to review and approval by IDEM, OAM.

10. Condition B.14 (Permit Shield) has been changed as follows:

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

- (a) **This condition provides a permit shield as addressed in 326 IAC 2-7-15.**
- ~~(a)~~ (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 either of the following:~~
 - (1) The applicable requirements are included and specifically identified in this permit; **or**
 - (2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof.~~ **The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.**
- ~~(b)~~ (c) ~~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. 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, 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.~~
- ~~(c)~~ (d) ~~If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, 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.~~ **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)~~ **(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.
- ~~(e)~~ **(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).
- ~~(f)~~ **(g)** This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- ~~(g)~~ **(h)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

11. Condition B.16 (Deviations from Permit Requirements and Conditions) has been changed as follows:

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

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.

- ~~(b)~~ **(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).**
- ~~(e)~~ **(d)** Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

12. Condition B.18 (Permit Renewal) part (a) has been changed as follows:

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, 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).**

13. Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification) and B.21 (Significant Permit Modification) have all been combined into a new Condition B.19 (Permit Amendment or Modification) as follows. Conditions B.20 and B.21 have been deleted and the remainder of Section B has been renumbered. The new B.19 condition reads as follows:

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**

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

14. Condition B.26 (now B.24) (Inspection and Entry) has removed "IDEM", since Local Agencies do not have IDEM identification cards. Also, part (e)(1) and (e)(2) have been added.

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

Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, 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, 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, nor an authorized representative, may disclose the information unless and until IDEM, OAM, 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, and IDEM, OAM, 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]

15. Condition B.27 (now B.25) (Transfer of Ownership or Operation) part (b) has been changed as follows:

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **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).**

16. Condition B.28 (now B.26) (Annual Fee Payment) has been changed as follows:

~~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, within thirty (30) calendar days of receipt of a billing. or in a time period consistent with the fee schedule established in 326 IAC 2-7-19. If the Permittee does not receive a bill from IDEM, OAM, 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) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.~~

17. Section C.1(Major Source) has been removed since Section A.1 indicates that the source is a major source and the explanations contained in C.1 are in the Technical Support Document and are not necessary in the permit.

~~C.1 Major Source~~

- (a) ~~Construction of the plasma arc cutting, welding, and surface coating facilities commenced prior to August 7, 1977. Since allowable VOC emissions from these facilities are greater than 250 tons per year, the source is a major PSD source. Because the facilities were constructed prior to August 7, 1977, the source is not required to obtain a PSD permit pursuant to 326 IAC 2-2-2 (Prevention of Significant Deterioration) for these facilities.~~
- (b) ~~The potential emissions after controls from the boiler and shot blasting facilities constructed after August 7, 1977 are less than that which would constitute a major modification to an existing major source. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply to these facilities. Any change or modification that would lead to an increase in emissions from the boiler and shot blasting facilities constructed after August 7, 1977 to above the PSD significant levels of any criteria pollutant shall require a PSD permit pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) before such a change may occur.~~

18. The following Condition C.1 (Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred pounds per hour) has been added:

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.

19. Section C.2 (Opacity) has been revised as follows:

C.2 Opacity [326 IAC 5-1]

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

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty four (24) consecutive readings,~~ **any one (1) six (6) minute averaging period** as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ 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.

~~This condition is not federally enforceable.~~

20. Section C.3 (Open Burning) has been revised as follows:

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. ~~This condition is not federally enforceable.~~ **326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.**

21. Section C.4 (Incineration) has been revised as follows:

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. ~~This condition is not federally enforceable.~~

22. Section C.5 (Fugitive Dust Emissions) has been revised as follows:

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). ~~Rule 326 IAC 6-4-2(4) regarding visible dust is not federally enforceable.~~ **326 IAC 6-4-2(4) is not federally enforceable.**

23. Condition C.6 (Operation of Equipment) has been changed as follows:

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. ~~as described in Section D of this permit. (Be sure to specify in Section A, any equipment that does not need to be operated at all times, but only at the source's discretion.)~~

24. Condition C.7 (Asbestos Abatement Projects- Accreditation) and Condition C.12 (Asbestos Abatement Projects) have been combined into one condition as follows:

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**

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). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to 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.

25. Condition C.8 (Performance Testing) has had the rule cite changed to 326 IAC 3-6 and the following language has been added:

C.8 Performance Testing ~~[326 IAC 3-2.1]~~ [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2.1~~ **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

no later than thirty-five (35) days ~~before~~ **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 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).

26. Condition C.9 (Compliance Schedule) has been changed as follows:

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** ~~Will continue to comply with such requirements that become effective during the term of this permit; 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.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

27. Condition C.10 (Compliance Monitoring) has been changed as follows:

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 compliance schedule an additional ninety (90) days provided the Permittee shall** notifies:

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

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

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

28. Condition C.11 (Monitoring Methods) has been changed as follows:

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.

29. Condition C.12 (Asbestos Abatement Projects) has been deleted and has been incorporated into the revised Condition C.12 (Asbestos Abatement Projects). The remainder of Section C has been renumbered accordingly.

~~C.12 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~~
- ~~(3) 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~~

- ~~(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.~~
- ~~(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to 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.~~

30. Condition C.13 (now C.12) (Emergency Reduction Plans) has been changed as follows:

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

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, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such plan.~~

(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, 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]

31. Condition C.14 (now C.13) (Risk Management Plan) has been changed as follows:

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 **in a process** in more than the 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, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, 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).

32. Condition C.15 (now C.14) (Compliance Monitoring Plan - Failure to Take Response Steps) has had the following rule cites added:

Condition C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]**[326 IAC 2-7-6] [326 IAC 1-6]**

33. Condition C.16 (now C.15) (Actions Related to Noncompliance Demonstrated by a Stack Test), has had the rule cites added to the title and following language added:

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).

34. Condition C.17 (now C.16) (Emission Statement) part (a) has been changed as follows:

- (a) The Permittee shall submit an ~~certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by **July 1** 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:

35. Condition C.19 (now C.18) (General Record Keeping Requirements) has been changed as follows:

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)]**[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** ~~within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~

36. Condition C.20 (now C.19) (General Reporting Requirements) has been revised as follows:

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- ~~(a) Reports required by conditions in Section D of this permit shall be submitted to:~~
- ~~Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
400 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015~~
- (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.**
- (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**
- ~~(b)~~ (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, on or before the date it is due.
- ~~(c)~~ (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.

~~(d)~~ (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable 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 or failure to monitor or record the required compliance monitoring is a deviation.~~

(e) (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(f) (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.

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).

Section D

37. Section D (Facility Operation Conditions) has had the following language added to the facility description box in all Section Ds:

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

38. Conditions D.1.3, D.2.3 and D.3.2 have been revised as follows:

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test this facility is not specifically required by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test~~ this facility is not specifically required by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.** If testing is required by **IDEM**, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

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

~~Testing of The Permittee is not required to test~~ these facilities is not specifically required by this permit. However, **IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance.** If testing is required by **IDEM**, 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. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

39. Condition D.1.5(b) (Visible Emission Notations) has been changed as follows.

- (b) Daily visible emission notations of the shot blast stack (S4) exhaust shall be performed during normal daylight operations **when exhausting to the atmosphere.** A trained employee shall record whether emissions are normal or abnormal.

40. The frequency of monitoring in Condition D.2.5 (Monitoring) has been changed as follows:

D.2.5 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray from the surface coating booth stacks (S5, S6, S7) while the booth is 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) ~~Weekly~~ **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. 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.

41. As a result of IDEM change 40, Condition D.2.6 (Record Keeping Requirements) has been changed as follows:

D.2.6 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations of the surface coating booth stacks, daily and ~~weekly~~ **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.

Forms

42. In the Certification Form, the words "Emergency/Deviation Occurrence Reporting Form" have been deleted as shown in the following Certification Form.
43. The Quarterly Compliance Report is now called the **Semi-Annual** Compliance **Monitoring** Report, the column marked "No Deviations" has been deleted and the language has been changed as indicated in the following pages.
44. The Emergency/Deviation Occurrence Reporting Form has had the phrase "Attach a signed certification to complete this report" deleted from the bottom of the second page. The changes are shown in the following forms.
45. The Natural Gas Fired Boiler Certification has been removed since the only boiler at this source operates solely on natural gas and has a capacity less than 10 million British thermal units per hour. In addition, Condition D.3.3 has been removed.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Talbert Manufacturing, Inc.
Source Address: 1628 West State Road 114, Rensselaer, Indiana 47978
Mailing Address: RR 5 Box 195, Rensselaer, Indiana 47978
Part 70 Permit No.: T 073-6926-00025

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 Emergency/Deviation Occurrence Reporting Form~~
- 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:

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: _____

Attach a signed certification to complete this report.

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

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

Source Name: Talbert Manufacturing, Inc.
 Source Address: 1628 West State Road 114, Rensselaer, Indiana 47978
 Mailing Address: RR 5 Box 195, Rensselaer, Indiana 47978
 Part 70 Permit No.: T 073-6926-00025

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 ~~quarterly~~ **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 ~~zero in the column marked "No Deviations"~~ **in the box marked "No deviations occurred this reporting period"**.

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD. LIST EACH COMPLIANCE MONITORING REQUIREMENT EXISTING FOR THIS SOURCE:

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

On December 11, 1997, Robert L. Henricks of GAI Consultants, Inc., on behalf of Talbert Manufacturing, Inc., submitted comments on the proposed Part 70 Operating Permit. The comments are as follows:

Comment 1:

Section A, Source Summary, A.2(a): The applicant requests the ability to use an alternate operating scenario shot blast media in the shot blast facility. The emissions in the application were calculated presuming the maximum process rate and maximum emission factor. Enclosed is a completed GSD-11 and a modified PI-23 requesting the use of alternate media.

Response 1:

Conservative emission factors were used in the calculation of emissions from shot blasting. Other brands and types of media may be used as long as the Permittee remains in compliance with the conditions of this Part 70 permit. The wording of the equipment list has been changed as follows:

One (1) shot blast facility, identified as (P6), **usually** using staurolite, **sand, granulated coal combustion by-product, or steel shot** as an abrasive, with a nozzle internal diameter of 0.375 inches and a nozzle pressure of 90 pounds per square inch gauge, with a blast shed settling chamber as control and exhausting to stack (S4), capacity: 1,532 pounds of ~~staurolite~~ shot blast media per hour.

Comment 2:

Section A, Source Summary, A.3(a): The applicant requests an evaluation, and if needed a correction, of the wording to reflect the actual source configuration. The permit seems to state that the three (3) forced-air units, the ten (10) radiant heaters, and the boiler exhaust at S3. For estimating purposes, it was assumed that all the natural gas was combusted in the plant boiler (P5). However, only the boiler exhausts at stack 3 (S3).

Response 2:

The wording of A.3(a) and Section D.3, emission unit (a), has been revised as follows:

Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour. ~~Three (3) forced air units, ten (10) radiant heaters, and~~ one (1) natural gas-fired boiler, identified as (P5), with a maximum heat input capacity of 3.35 million British thermal units per hour and exhausting to stack (S3), **three (3) forced air units, and ten (10) radiant heaters**. Total heat input capacity of all combustion units is 5.65 million British thermal units per hour.

There are no changes in the conditions due to this revision.

Comment 3:

Section A, Source Summary, A.4(b): This part states that the source is "a source category designated . . . by 40 CFR 70.3." Would the Agency please be more specific concerning the specific part of the cited federal regulation designating a source category applicable to one or more of the plant operations.

Response 3:

Since this source is a major source based on the Part 70 definition of a major source, and is not listed as an exempt source category, Part 70 is applicable according to 40 CFR 70.3 (a)(1). For reference, a copy of 40 CFR 70.3 is attached. There is no change in the language of A.4(b).

Comment 4:

Section B, General Conditions, B.11(c): This part requires the annual compliance certification to identify each term and condition of the permit. Would the Agency please supply a computer accessible copy of the permit to minimize the time and effort to recreate the same. The information could either be provided by email (gaifw@mixi.net) or by copying the permit onto a computer disk.

Response 4:

A copy of the permit can be sent on computer disk or by e-mail in supplement of the usual hard copy provided. However, the Permittee does not need to print out a copy of the permit and certify to each and every requirement. IDEM is revising Nonrule Policy Document 007 so that it includes guidance on the submittal of an annual compliance certification for Title V permits. A copy of AIR 007 NPD, which applies to FESOP permits, is included with this response to comments.

Comment 5:

Section B, General Conditions, B.12(b): Please specify the specific regulatory requirement for this condition.

Response 5:

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each Permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each Permittee's Annual Compliance Certification. Each Permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the Permittee's Preventive Maintenance Plan(PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement.

The maintenance plan was to set out the "corrective actions" that the Permittee would take in the event an inspection indicated an "out of specification situation," and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the Permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a Permittee's maintenance staff handle the routine maintenance of the equipment, and a Permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements became separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comments sought clarification on whether the failure to follow the PMP was a violation of the permit. The concern was that a Permittee's PMP might call for the Permittee to have, for example, three "widget" replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the Permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the Permittee fails to follow its PMP, a permit violation will occur only if the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the Permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most Permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer for the regular inspection and maintenance of the equipment. The Permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicated, or the Permittee may know from experience, what replacement parts should be kept on hand. The Permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the Permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The Permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely well and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the Permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13) and for each FESOP permit pursuant to 326 IAC 2-8-4(9). Both of those rules refer back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (a) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (b) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (c) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most Permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's trouble shooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the Permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A Permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the Permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading (Guidance, page 13). Some of the terminology has changed, as a result of comments from regulated sources, but the requirements in the permit do not conflict with the guidance. There are no changes in the condition.

Comment 6:

Section B, General Conditions, B.12(c): Please replace PMP's with PMP. This corrects the typographical error and enables the reference to Preventive Maintenance Plans (PMP) to coincide with 12(a).

Response 6:

In Condition B.12(c) (Preventive Maintenance Plan), the term "PMP's" has been replaced with "PMP."

Comment 7:

Section B, General Conditions, B.26(e): This condition sites 326 IAC 2-7-6(6) as authority for the requirements of the same. The cited rule contains the following: "Such other provisions as the commissioner may require." This draft permit condition restates an action allowed by specified authorized representatives, versus including "other" actions. Specifically, B.26(d) already authorizes monitoring. Please delete this action from 26(e).

Response 7:

Condition B.26(d) (now B.24(d)) (Inspection and Entry) solely includes sampling and monitoring while B.26(e) (now D.24(e)) includes "...photographic, recording, testing, monitoring, or other equipment..." Condition B.26(e) (now B.24(e)) is necessary and is not removed from this Part 70 permit. Condition B.26(e) (now B.24(e)) has been revised as indicated in item 14 of the IDEM changes.

Comment 8:

Section B, General Conditions, B.27(a): The condition seems to over state the authority granted in the cited regulation: 326 IAC 2-1-6, specifically part (a). The written notification required of part (a) states specifically that the specified information "shall be sufficient to transfer the permit from the current owner or operator of the source or facility to the new owner." Please change the condition to read as follows: "In the event that ownership of this source is changed, the IDEM, OAM shall be notified by the current owner or operator within thirty (30) days of the change. Notification shall include the date or proposed date of said change in ownership."

Response 8:

Condition B.27(a) (now B.25(a)) (Transfer of Ownership or Operation) specifically states what information is needed. Condition B.27(a) is necessary and is not changed in this Part 70 permit.

Comment 9:

Section B, General Conditions, B.28(d): Please add the following condition as an applicable part of the cited rule. The wording is the applicable part of 326 IAC 2-7-19(e). "If the source disputes the calculation of total emissions at the time of the billing, the source shall remit the total fee minus the amount attributable to the disputed emissions total within thirty (30) days of the receipt of a billing. The source shall provide supporting emissions calculations for the IDEM, OAM review no later than thirty (30) days from receipt of the initial billing. The IDEM, OAM shall review the information and make a final determination of the total annual fee. The source shall pay any remaining fee within fifteen (15) days of receipt of a second billing. The commissioner's determination of a final fee amount is a final action for purposes of IC 4-21.5."

Response 9:

Condition B.28 (now B.26) (Annual Fee Payment) satisfies the wording requested because the rule cite is included. Should the source dispute the calculation of total emissions at the time of the billing the steps illustrated in 326 IAC 2-7-19 shall be followed. In addition, subsection (c) of this condition now states:

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.

Comment 10:

Section C, Source Operating Conditions, C.3: This section references, but does not include, the specifics of, the exceptions to the open burning prohibitions. The permit would be more complete if these exceptions were included.

Response 10:

Condition C.3, Open Burning, states:

"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."

Although the specific exemptions are not listed, they are referenced. The exempt types of open burning are subject to specific conditions that must be followed and include certain types agricultural burning, certain undesirable structural burnings, ceremonial, recreational and cooking fires, clean wood and paper burning in enclosed containers at specific types of private homes, and certain types of waste oil burning (326 IAC 4-1-3).

Other exemptions include IDEM approved emergency open burning (326 IAC 4-1-4) and burnings using IDEM approved air curtain destructors operated under certain conditions (326 IAC 4-1-6). This present wording of the condition is sufficient to place the Permittee on notice of the exemptions and there is no change in the condition.

Comment 11:

Section C, Source Operating Conditions, C.8: This section should include the notification requirement of 326 IAC 3-2.1(e): The source operator shall notify the department of the actual test date at least two (2) weeks prior to the date.

Response 11:

The rule 326 IAC 3-2.1 was cited. That rule citation has changed due to an amendment to the rule which took effect on March 2, 1998. The new citation is 326 IAC 3-6. In general, all provisions of each rule can not be recited in the permit. As the Permittee correctly notes, the OAM's Compliance Data Section shall be notified of the actual test date at least two (2) weeks prior to the date. The rule cite for Condition C.8 has been changed from 326 IAC 3-2.1 to 326 IAC 3-6.

Comment 12:

Section C, Source Operating Conditions, C.13: 325 IAC 1-5-2 requires such plans of any person responsible for the operation of a source that has the potential to emit one hundred (100) tons per year, or more, of any regulated pollutant. The regulations offer no hint as to the sources to which such a plan is not needed. Does the requirement apply only to potential 100 ton per year sources? Examples, such as utilized in Illinois, would be most helpful.

Response 12:

Pursuant to 326 IAC 1-5-2, Emergency Reduction Plans are required of, "All persons responsible for the operation of a source that has the potential to emit one hundred (100) tons per year, or more, of any pollutant..." Therefore, an Emergency Reduction Plan is required for this source.

Comment 13:

Section C, Source Operating Conditions, C.15(a)(5) & (b) & (c): These conditions require or reference a Compliance Response Plan. Such a plan is not mentioned, referenced, or inferred in the regulatory citation: 326 IAC 2-7-5(3). Please specify the regulatory requirement.

Response 13:

See Response 5.

Comment 14:

Section C, Source Operating Conditions, C.16: Please specify the regulatory requirement.

Response 14:

The specific regulatory requirement for Condition C.16 (now C.15) (Actions Relating to Noncompliance Demonstrated by a Stack Test) is the citation used for the entire Corrective Actions and Response Steps section. The rules cited are 326 IAC 2-7-5 and 326 IAC 2-7-6. The provision is also consistent with the Compliance Monitoring Plan provisions and the reporting of deviations. The rule cites are now added to the authority for Condition C.16.

Comment 15:

Section C, Source Operating Conditions, C.17: The emission statement requirements of 326 IAC 2-6-4 are very specific and comprehensive. They should be included in the permit.

Response 15:

The rule cite is sufficient. The specific requirements do not need to be included in the permit. For reference, a copy of 326 IAC 2-6-4 is attached. There is no change in Condition C.17 (now C.16).

Comment 16:

Section C, Source Operating Conditions, C.18(a): To preclude the implication that testing, observations, sampling, maintenance, and record keeping must be performed continuously, e.g. at all times that normal operation conditions exist, remove the word "all" from the third line, such that the referenced activities "shall be performed at times the equipment . . ."

Response 16:

The following change has been made to Condition C.18(a) (now C.17(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 **when** the equipment is operating at normal representative conditions.

Comment 17:

Section C, Source Operating Conditions, C.19(a): Regulation 326 IAC 2-7-6(2)(B) should be added to correctly identify the records access requirement.

Response 17:

The rule cite [326 IAC 2-7-5(3)] and [326 IAC 2-7-6] have been added to the authority for Condition C.19 (now C.18) (General Record Keeping Requirements).

Comment 18:

Section C, Source Operating Conditions, C.19(c)(4): Please specify the regulatory requirement for a Compliance Response Plan.

Response 18:

See Response 5.

Comment 19:

Section C, Source Operating Conditions, C.20(c): The cited regulation speaks to “reporting . . . at least every six (6) months.” What is the justification to require quarterly reporting?

Response 19:

The rule gives IDEM the authority to require reports “at least” every six months. IDEM feels that a period of time longer than every quarter will usually not provide sufficient reporting of continuous compliance monitoring. The requirement for a quarterly compliance report, however, has been changed to a semi-annual compliance monitoring report for this source since there are no other quarterly reports required.

Comment 20:

Section D, Facility Operating Conditions, D.1 (a): As requested on the enclosed PI-23 and GSD-11, the applicant requests that the permit reference approval to use alternate blast media: other sands, steel shot, and grit. The one media for which use is stated in the draft permit is a trade name. The use of alternate brands and types is desirable.

Response 20:

See Response 1.

Comment 21:

Section D, Facility Operating Conditions, D.1.5(f): Please specify the regulatory requirement for a Compliance Response Plan.

Response 21:

See Response 5.

Comment 22:

Section D, Facility Operating Conditions, D.2.5(a): The daily inspections need not include the particulate loading or overspray on the inlet side of the paint filters. Please delete this requirement in the first and second sentences or clarify that this requirement applies to the discharge of the paint booth exhausts.

Response 22:

Condition D.2.5(a), Monitoring, contains standard wording for surface coating operations. To clarify the requirement the wording of D.2.5(a) has been changed to:

Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray **from the surface coating booth stacks (S5, S6, S7) while the booth** is 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 Response Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Comment 23:

Section D, Facility Operating Conditions, D.2.5(b): Please specify the regulatory requirement for a Compliance Response Plan.

Response 23:

See Response 5.

Comment 24:

Section D, Facility Operating Conditions, D.2.6(a): Please clarify that the observations pertain to the discharge of the paint booth exhausts.

Response 24:

As a result of the Condition D.2.5 language change in Response 22, Condition D.2.6(a), Record Keeping Requirements, is changed to the following:

To document compliance with Condition D.2.1, the Permittee shall maintain a log of daily overspray observations **of the surface coating booth stacks**, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Comment 25:

Section D, Facility Operating Conditions, D.3.1(b): The cited regulation applies to process operations where the process rate can be determined. Please clarify how a process rate is to be determined for a plasma arc cutting table and the wood working equipment.

Response 25:

Plasma arc cutting and wood working are process operations. They must comply with 326 IAC 6-3-2. The process weight rate should be the process weight rate of the material from which the emissions originate. The process weight rate can be found a number of different ways including weighing the material throughput at the plasma arc cutting table and wood working equipment in pounds per hour. One possible method is to determine a throughput factor in pounds per cubic inch of raw material. The process weight rate is variable, thus, a constant limit is not computed. These insignificant activities, however, can show compliance for a given hour by measuring the process weight rate for that hour. The 326 IAC 6-3-2 limit is an hourly emission limit.

Comment 26:

Talbert Manufacturing, Inc. has undergone a management change since the application was submitted in late 1996. Mr. Rick L. Odle should be listed as the contact person, the responsible official, and the agent.

Response 26:

The responsible official portion of Section A.1 has been revised as follows:

Responsible Official: ~~Davis Wakefield~~ Rick L. Odle

**Appendix A: Emission Calculations
Abrasive Blasting**

Company Name: Talbert Manufacturing, Inc.
Plant Location: 1628 West State Road 114, Rensselaer, Indiana 47978
Title V: T073-6926
Plt ID: T073-00025
County: Jasper
Permit Reviewer: CarrieAnn Ortolani
Date: October 15, 1996

Table 1 - Emission Factors for Abrasives

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

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487
Staurolite	230.8

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)
 FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =
 D = Density of abrasive (lb/ft3) From Table 2 =
 D1 = Density of sand (lb/ft3) =
 ID = Actual nozzle internal diameter (in) =
 ID1 = Nozzle internal diameter (in) from Table 3 =

657
230.8
99
0.375
0.375

Flow Rate (FR) (lbs/hr) = 1531.673 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =
 FR = Flow Rate (lb/hr) =
 w = fraction of time of wet blasting =
 N = number of nozzles =

0.041
1531.673
0 %
1

**Uncontrolled PM Emissions = 62.8 lbs/hr
275 tons/yr**

PM-10 Emission factor (lb PM-10/lb PM) from Table 1 =

0.70000

**Uncontrolled PM-10 Emissions = 44.0 lbs/hr
193 tons/yr**

Control Efficiency =

99.9%

**Controlled Emissions = PM = 0.275 tons/yr
PM-10 = 0.193 tons/yr**

METHODOLOGY

Emission Factors from Stappa Alapco, Section 3 "Abrasive Blasting"
 Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs
 Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)² x (D/D1)
 E = EF x FR x (1-w/200) x N
 w should be entered in as a whole number (if w is 50%, enter 50)

**Appendix A: Federal Potential Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

**Company Name: Talbert Manufacturing, Inc.
Address City IN Zip: 1628 West State Road 114, Rensselaer, Indiana 47978
TitleV ID: T073-6926
Plt ID: T073-00025
Reviewer: CarrieAnn Ortolani
Date: October 15, 1996**

Material	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)	Flash-off (fraction)	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 tons per year	lb VOC /gal solids	Transfer Efficiency
P7																	
Urotec Clear Base	8.03	62.30%	0.0%	62.3%	0.0%	37.70%	1.00000	76.000	1.000	5.00	5.00	380.20	9124.91	1665.30	251.93	13.27	75%
Isocyanate Hardener	8.85	25.00%	0.0%	25.0%	0.0%	75.00%	1.00000	76.000	1.000	2.21	2.21	168.15	4035.60	736.50	552.37	2.95	75%
Epoxy Primer	10.11	47.82%	0.0%	47.8%	0.0%	52.18%	1.00000	76.000	1.000	4.83	4.83	367.43	8818.31	1609.34	439.02	9.27	75%
Epoxy Primer Catalyst	7.17	82.59%	0.0%	82.6%	0.0%	17.41%	1.00000	76.000	1.000	5.92	5.92	450.05	10801.19	1971.22	103.88	34.01	75%
Wash Primer	7.35	85.22%	0.0%	85.2%	0.0%	14.78%	1.00000	76.000	1.000	6.26	6.26	476.04	11424.93	2085.05	90.40	42.38	75%
Wash Primer Catalyst	6.83	98.59%	2.0%	96.6%	UNK	1.41%	1.00000	76.000	1.000	6.60	6.60	501.38	12033.10	2196.04	8.01	467.88	75%
Vinyl Acrylic Primer	8.07	73.62%	0.0%	73.6%	0.0%	26.38%	1.00000	76.000	1.000	5.94	5.94	451.53	10836.63	1977.68	177.16	22.52	75%
Aromatic Solvent	7.19	100.00%	0.0%	100.0%	0.0%	0.00%	1.00000	76.000	1.000	7.19	7.19	546.44	13114.56	2393.41	0.00	N/A	75%
Solvent Blend	7.05	100.00%	0.0%	100.0%	0.0%	0.00%	1.00000	76.000	1.000	7.05	7.05	535.80	12859.20	2346.80	0.00	N/A	75%

State Potential Emissions

Add worst case coating to all solvents

546	13115	2393	552
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Control Technology Emissions (Combustion)		Emission Factors								Emissions					
Type	Number	Capacity	Gas usage	PM	PM10	SO2	NOx	VOC	CO	PM	PM10	SO2	NOx	VOC	CO
		MMBtu/hr	MMCF/yr	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	lb/MMCF	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr	tons/yr
Catalytic			0.0	3.0	3.0	0.6	100.0	5.3	35.0	0.0	0.0	0.0	0.0	0.0	0.0
Thermal			0.0	3.0	3.0	0.6	140.0	2.8	20.0	0.0	0.0	0.0	0.0	0.0	0.0
Total			0.0							0.0	0.0	0.0	0.0	0.0	0.0
										Control Efficiency	Controlled	Controlled	Controlled	Controlled	
										VOC	PM	VOC pounds	VOC pounds	VOC	Particulate
										0.998		per hour	per day	tons/yr	tons/yr

Controlled Emissions due to Surface Coating Operations and Controls

546	13115	2393	1.10
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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) * Flash-off
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off
 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) * Flash-off
 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) * Flash-off
 Total = Worst Coating + Sum of all solvents used

HAP Emission Calculations

Company Name: Talbert Manufacturing, Inc.
Plant Location: 1628 West State Road 114, Rensselaer, Indiana 47978
Title V: T073-6926
Plt ID: T073-00025
County: Jasper
Permit Reviewer: CarrieAnn Ortolani
Date: October 15, 1996

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % MIBK	Weight % MEK	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Formaldehyde Emissions (tons/yr)	MIBK Emissions (tons/yr)	MEK Emissions (tons/yr)
P7														
Urotec Clear Base	8.03	1.00000	76.000	1.00	10.00%	5.00%	0.00%	5.00%	0.00%	267.30	133.65	0.00	133.65	0.00
Isocyanate Hardener	8.85	1.00000	76.000	1.00	15.00%	0.00%	0.00%	0.00%	0.00%	441.90	0.00	0.00	0.00	0.00
Epoxy Primer	10.1	1.00000	76.000	1.00	0.00%	5.00%	0.00%	0.00%	15.00%	0.00	168.27	0.00	0.00	504.81
Epoxy Primer Catalyst	7.17	1.00000	76.000	1.00	10.00%	15.00%	0.00%	0.00%	0.00%	238.67	358.01	0.00	0.00	0.00
Wash Primer	7.35	1.00000	76.000	1.00	10.00%	10.00%	1.00%	0.00%	0.00%	244.67	244.67	24.47	0.00	0.00
Wash Primer Catalyst	6.83	1.00000	76.000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Vinyl Acrylic Primer	8.07	1.00000	76.000	1.00	10.00%	2.00%	0.00%	0.00%	20.00%	268.63	53.73	0.00	0.00	537.27
Aromatic Solvent	7.19	1.00000	76.000	1.00	4.00%	0.00%	0.00%	0.00%	0.00%	95.74	0.00	0.00	0.00	0.00
Solvent Blend	7.05	1.00000	76.000	1.00	0.00%	60.00%	0.00%	10.00%	10.00%	0.00	1408.08	0.00	234.68	234.68

Total State Potential Emissions

TOTALS:	(tons/yr):	442	1408	24.5	235	537
	(lb/hr):	101	322	5.59	53.6	123
	(g/sec):	12.7	40.5	0.704	6.76	15.5

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Weight % Cumene	Weight % Chromium Compounds	Weight % Glycol Ethers	Weight % Hexamethylene Diisocyanate	Weight % Methanol	Cumene Emissions (tons/yr)	Chromium Compound Emissions (tons/yr)	Glycol Ether Emissions (tons/yr)	Hexamethylene Diisocyanate Emissions (tons/yr)	Methanol Emissions (tons/yr)
P7														
Urotec Clear Base	8.03	1.00000	76.000	1.00	0.00%	0.00%	15.00%	0.00%	0.00%	0.00	0.00	400.95	0.00	0.00
Isocyanate Hardener	8.85	1.00000	76.000	1.00	0.00%	0.00%	0.00%	1.00%	0.00%	0.00	0.00	0.00	29.46	0.00
Epoxy Primer	10.1	1.00000	76.000	1.00	0.00%	0.00%	5.00%	0.00%	0.00%	0.00	0.00	168.27	0.00	0.00
Epoxy Primer Catalyst	7.17	1.00000	76.000	1.00	0.00%	0.00%	25.00%	0.00%	0.00%	0.00	0.00	596.69	0.00	0.00
Wash Primer	7.35	1.00000	76.000	1.00	0.00%	2.00%	10.00%	0.00%	5.00%	0.00	48.93	244.67	0.00	122.33
Wash Primer Catalyst	6.83	1.00000	76.000	1.00	0.00%	0.00%	0.00%	0.00%	5.00%	0.00	0.00	0.00	0.00	113.68
Vinyl Acrylic Primer	8.07	1.00000	76.000	1.00	0.00%	0.00%	5.00%	0.00%	0.00%	0.00	0.00	134.32	0.00	0.00
Aromatic Solvent	7.19	1.00000	76.000	1.00	2.00%	0.00%	0.00%	0.00%	0.00%	47.87	0.00	0.00	0.00	0.00
Solvent Blend	7.05	1.00000	76.000	1.00	0.00%	0.00%	4.00%	0.00%	10.00%	0.00	0.00	93.87	0.00	234.68

Total State Potential Emissions

TOTALS:	(tons/yr):	47.9	48.9	597	29.5	235
	(lb/hr):	10.9	11.2	136	6.73	53.6
	(g/sec):	1.38	1.41	17.2	0.848	6.76

METHODOLOGY

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

**Appendix A: Emissions Calculations
From Welding Operations (Insignificant Activity)**

Company Name: Talbert Manufacturing, Inc.
Plant Location: 1628 West State Road 114, Rensselaer, Indiana 47978
Title V: T073-6926
Plt ID: T073-00025
County: Jasper
Permit Reviewer: CarrieAnn Ortolani
Date: October 15, 1996

Type of Welding	Number of Units	Electrode Type	Maximum Electrode Consumption per Unit (lbs/hr)	Emission Factors (lb pollutant/lb electrode consumed)					Potential Emissions (tons/yr)					
				PM	Cr	Co	Mn	Ni	PM	Cr	Co	Mn	Ni	
P2														
Metal Inert Gas (MIG)	34.0	Carbon Steel	1.85000	0.0241	0.000530	0.000001	0.0003	0.001250	6.64E+00	1.49E-01	2.76E-04	9.53E-02	3.44E-01	
					00001 (Cr IV)									
P3														
Submerged Arc Welding (SAW)	2.0	Carbon Steel	3.35000	0.0001	ND	ND	ND	ND	1.47E-03	0.00E+00	0.00E+00	0.00E+00	0.00E+00	
P4														
Shielded Metal Arc Welding (SMAW)	1.0	Carbon Steel	7.14000	0.0816	0.0025	0.0000	0.0232	0.0017	2.55E+00	7.91E-02	3.13E-05	7.26E-01	5.35E-02	
Calculations using worst case electrode.														
Total Potential Emissions (tons/yr):									9.19E+00	2.28E-01	3.07E-04	8.21E-01	3.98E-01	

METHODOLOGY

Emissions (tons/yr) = Number of Units * Maximum Electrode Consumption per Unit * Emission Factor (lb pollutant/lb electrode consumed) * 8760 (hrs/yr) * (1 ton/2000 lbs)
 Emission Factors are from AP-42 12.19-1.

From Plasma Arc Cutting Operations (Insignificant Activity)

Type of Cutting	Number of Units	Maximum Plate Size (inches)	Maximum Cutting Speed (in/min)	Emission Factors (lb pollutant/1,000,000 ft cut)					Potential Emissions (tons/yr)					
				PM	Cr	Co	Mn	Ni	PM	Cr	Co	Mn	Ni	
P1														
Plasma Arc Cutting (PAC)	1.0	1	120	2800.0000	5.600000	0.600000	8.40000	1.400000	7.36E+00	1.47E-02	1.58E-03	2.21E-02	3.68E-03	

One cutting table with four cutting torches. One torch operates at a time.

Emissions (tons/yr) = number of units * plate size * maximum cutting speed (inches/min) * emission factor (lb pollutant/1,000,000 ft cut) * (1 ton/2000 lbs) * (8760 hrs/1 yr) * (1 ft/12 inches) * (60 min/1 hr)
 Emission Factors are from the SARA 313 Reporting Guide.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 10
Commercial Boiler (Insignificant Activity)**

Company Name: Talbert Manufacturing, Inc.
Plant Location: 1628 West State Road 114, Rensselaer, Indiana 47978
Title V: T073-6926
Pit ID: T073-00025
County: Jasper
Permit Reviewer: CarrieAnn Ortolani
Date: October 15, 1996

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

3.35

29.3

Pollutant

Emission Factor in lb/MMCF	PM 12.0	PM10 12.0	SO2 0.6	NOx 100.0	VOC 5.3	CO 21.0
Potential Emission in tons/yr	0.176	0.176	0.009	1.47	0.078	0.308

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low NOx Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

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, 1.4-2, and 1.4-3, SCC #1-03-006-03

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

Allowable emissions from the boiler according to 326 IAC 6-2-3:

Heat Input Capacity MMBtu/hr	Number of stacks	Stack height feet	PM allowable lbs/mmBtu	PM allowable tons/yr	Truncated PM allowable lbs/mmBtu	Truncated PM allowable tons/yr	Potential PM lbs/mmBtu
3.35	1	25	4.42	64.9	0.6	8.80	0.012

Methodology

Allowable emissions (lbs/mmBtu) = 1.09/(Heat input capacity^{0.26}) truncated to 0.6 pursuant to 326 IAC 6-2-3 (e)

Allowable emissions (tons/yr) = allowable (lbs/mmBtu) * heat input capacity * 8760 hours/yr / 2000 tons/lb

Potential emission (lbs/mmBtu) = Emission factor (lbs/MMCF) * 1 MMCF/1000MMBtu