

# FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OFFICE OF AIR MANAGEMENT  
and  
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION  
AIR QUALITY MANAGEMENT SECTION

**CMW Inc.**  
**70 S. Gray Street**  
**Indianapolis, Indiana 46201**

CMW Inc. 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 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-7415-00297	
Issued by: Robert Holm, Administrator Environmental Resources Management Division	Issuance Date:

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## SECTION A SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary metals welding operation with processes including: silver extrusion, metal forming brazing, metal powder mixing, powder pressing, sintering, metal machining, cold heading, cleaning, degreasing.

Responsible Official: Howard Johnston  
Source Address: 70 S. Gray Street Indianapolis, Indiana 46201  
Mailing Address: P.O. Box 2066 Indianapolis, Indiana 46206  
SIC Code: 3643, 3356, 3548  
County Location: Marion  
County Status: Attainment  
Source Status: Federally Enforceable State Operating Permit (FESOP)

Major Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) natural gas fired boiler, identified as EU<sub>1</sub>, installed in January of 1984 with a maximum capacity of 11.7 million Btu per hour, and exhausting at one (1) stack, identified as stack SV#1.
- (b) One (1) batch vapor degreaser using trichloroethylene, identified as EU<sub>9</sub>, installed in March of 1978, with a solvent/air interface area of greater than 13 feet, exhausting at one stack, identified as SV#5.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million Btu Per hour.
- (2) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6, (One (1) trichloroethylene degreaser).
- (3) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (4) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (5) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (6) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

- (7) Noncontact cooling tower systems with forced and induced draft cooling tower system not regulated under a NESHAP.
- (8) Paved and unpaved roads and parking lots with public access.
- (9) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (10) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (11) A laboratory as defined in 326 IAC 2-7-1(20)(c).

**A.4 FESOP Applicability [326 IAC 2-8-2]**

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and the Indianapolis Environmental Resources Management Division (ERMD) for a Federally Enforceable State Operating Permit (FESOP).

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

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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.

## **SECTION B GENERAL CONDITIONS**

**B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]**

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

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

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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 2-8-4(2)]**

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

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

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- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and ERMD.

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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

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

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

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

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

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

and

Environmental Resources Management Division  
Air Quality Management Section  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (b) The Permittee shall furnish to IDEM, OAM, and ERMD within a reasonable time, any information that IDEM, OAM, and ERMD may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and ERMD copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM, and ERMD along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall 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 Order Issuance [326 IAC 2-8-5(b)]

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

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

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(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.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The 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 15th of each year to:

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD 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 continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, and ERMD may require to determine the compliance status of the source.

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).

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

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

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM and ERMD, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM, OAM

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

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

ERMD

Telephone No.: 317-327-2234

Facsimile No.: 317-327-2274

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

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

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

and

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM and ERMD, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM and ERMD, by telephone or facsimile 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

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

and

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

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

- (b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and ERMD and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21).

Request for renewal shall be submitted to:

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

and

Environmental Resources Management Division  
Air Quality Management Section, Permits  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM and ERMD upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM and ERMD takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM and ERMD, any additional information identified as needed to process the application.

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

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

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

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

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

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, review by affected states and review by U.S. EPA, as they apply to permit issuance and renewal.

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

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

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

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

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

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

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

Environmental Resources Management Division  
Air Quality Management Section, Permits  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

and

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

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

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

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

(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(33).

- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). 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.24 Construction Permit Requirement [326 IAC 2]**

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

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]

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

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

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and ERMD, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10.
- (c) IDEM, OAM and ERMD shall reserve the right to issue a new permit.

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

- (a) The Permittee shall pay annual fees to IDEM, OAM, and ERMD, within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-8-16.
- (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.

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

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

**C.1 Overall Source Limit [326 IAC 2-8]**

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

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period.
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.

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

**C.2 Opacity [326 IAC 5-1]**

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

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

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

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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(3)]**

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

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

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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 2-8-5(a)(4)]**

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All air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

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

**C.7 Performance Testing [326 IAC 3-2.1]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM,OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

and

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

no later than thirty-five (35) days before the intended test date.

- (b) All test reports must be received by IDEM, OAM and ERMD 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 and ERMD, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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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 shall notify:

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

and

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

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

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

##### **C.9 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]**

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- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation.

In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.10 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the 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.11 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

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

and

Environmental Resources Management Division  
Air Quality Management Section, Asbestos  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

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

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

##### C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present 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, and ERMD that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, and ERMD that the Risk Management Plan is being properly implemented.

##### C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, 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.

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

#### **C.14 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]**

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

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

and

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

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

#### **C.15 Monitoring Data Availability**

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- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM and ERMD representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of 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.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance 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

and

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations 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.

- (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.

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

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

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

**SECTION D.1 FACILITY OPERATION CONDITIONS**

- (a) One (1) batch vapor degreaser using trichloroethylene, identified as EU<sub>9</sub>, installed in March of 1978, with a solvent/air interface area of greater than 13 feet, exhausting at one stack, identified as SV#5.

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

**D.1.1 Hazardous Air Pollutants (HAP) [326 IAC 2-8-4]**

Pursuant to 326 IAC 2-8-4 (FESOP: Permit Content):

- (a) Any single regulated HAP emissions from the vapor degreasing operations shall not exceed 1,548 gallons per 12 month rolling sum. This throughput limit is equivalent to 9.4 tons of trichloroethylene per 12 month rolling sum.

Therefore, the requirement of 326 IAC 2-7 does not apply.

**D.1.2 Halogenated Solvent Cleaning Machine NESHAP [40 CFR Part 63, Subpart T]**

This facility is subject to 40 CFR Part 63, Subpart T, (Halogenated Solvent Cleaning Machine NESHAP) that was promulgated on December 2, 1994. The source shall come into compliance with this rule no later than December 2, 1997.

The following design requirements for the degreasing operation are applicable:

- (a) Reduce the room draft as described in §63.463(e)(2)(ii).
- (b) A freeboard ratio of 0.75 or greater shall be maintained.

- (c) An automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts shall be installed.
- (d) The degreaser shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
- (e) The degreaser shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
- (f) The degreaser shall have a primary condenser.
- (g) A combination of controls, including a freeboard refrigeration device, reduced room draft, and a freeboard ratio of 1.0 shall be used.
- (h) Monitoring shall be conducted of each control device used.

The following operational practices for the degreasing operation are applicable:

- (a) Parts baskets or the parts being cleaned in the degreaser shall not occupy more than fifty percent (50%) of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.
- (b) Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air.
- (c) Parts shall be oriented so that the solvent drains from them freely. Parts with holes may need to be tipped or rotated before being removed.
- (d) Parts or baskets shall not be removed from any solvent cleaning machine before dripping has stopped.
- (e) During startup the primary condenser shall be turned on before the sump heater.
- (f) During shutdown the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.
- (g) When solvent is added or drained, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.
- (h) The machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or by EPA approved alternative methods.
- (i) Each operator shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in appendix B of Subpart T, if requested during an inspection.
- (j) Waste solvent ,still bottoms, and sump bottoms shall be collected and stored in closed containers that may contain a pressure relief device.
- (k) Sponges, fabric, wood, and paper products shall not be cleaned.

### D.1.3 Degreasing Operations [326 IAC 8-3-6]

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Pursuant to 326 IAC 8-3-6 (Open top vapor degreaser operation and control requirements), the owner or operator of an open top vapor degreaser shall ensure that the following control equipment requirements are met:

(a) The owner or operator of an open top vapor degreaser shall ensure that the following control equipment requirements are met:

(i) Equip the degreaser with a cover that can be opened and closed easily without disturbing the vapor zone.

(ii) Equip the degreaser with the following switches:

(A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.

(B) A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).

(iii) Equip the degreaser with a permanent, conspicuous label which lists the operating requirements.

(iv) Equip the degreaser with one (1) of the following control devices:

(A) A freeboard ratio of seventy-five hundredths (0.75) or greater and a powered cover if the degreaser opening is greater than one (1) square meter (ten and eight-tenths (10.8) square feet).

(B) A refrigerated chiller.

(C) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser.

(D) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to vapor interface area and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.

(E) Other systems of demonstrated equivalent or better control as those outlined in clauses (A) through (D). Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) The owner or operator of an open top vapor degreaser shall ensure that the following operating requirements are met:

(i) Keep the cover closed at all times except when processing workloads through the degreaser.

(ii) Minimize solvent carryout emissions by:

(A) racking articles to allow complete drainage;

(B) moving articles in and out of the degreaser at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute);

(C) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;

(D) tipping out any pools of solvent on the cleaned articles before removal; and

(E) allowing articles to dry within the degreaser for at least fifteen (15) seconds or until visually dry.

(iii) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood, or rope.

(iv) Prohibit occupation of more than one-half (1/2) of the degreaser's open top area with the workload.

(v) Prohibit the loading of the degreaser to the point where the vapor level would drop more than ten (10) centimeters (four (4) inches) when the workload is removed.

(vi) Prohibit solvent spraying above the vapor level.

(vii) Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately.

(viii) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

(ix) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements.

(x) Prohibit the use of workplace fans near the degreaser opening.

(xi) Prohibit visually detectable water in the solvent exiting the water separator.c

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

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

### **Compliance Determination Requirements**

#### D.1.5 Monitoring Requirements

The Permittee shall determine whether each control device used to comply with 40 CFR 63, Subpart T meets the following requirements:

- (a) Ensure weekly that the chilled air blanket temperature measured at the center of the air blanket of the freeboard refrigeration device is no greater than thirty percent (30%) of the solvent's boiling point. A thermometer or thermocouple shall be used to measure the temperature at the center of the air blanket during the idling mode.

- (b) Ensure that flow or movement of air across the top of the freeboard area of the solvent cleaning machine , or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time, as measured using the procedures in § 63.466(d).
  - (i) The Permittee shall conduct initial and quarterly monitoring of wind speed within six (6) inches above the top of the freeboard area of the solvent cleaning machine as follows:
    - (A) Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located;
    - (B) Orient a velometer in the direction of the wind current at each of the four corners of the machine;
    - (C) Record the reading for each corner;
    - (D) Average the values obtained at each corner and record the average wind speed.
- (c) Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in § 63.466(d).
  - (i) Monitor initially and weekly, the room parameters established during the initial compliance test that are used to achieve the reduced room draft.
- (d) Monitor the hoist speed as follows:
  - (i) Determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
  - (ii) Monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the owner or operator may begin monitoring the hoist speed quarterly.
  - (iii) If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated.
  - (iv) If an owner or operator can demonstrate to EPA's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.
- (d) If any of the requirements of the above (a, b, or c) are not met, the Permittee shall determine whether an exceedance has occurred.
  - (i) An exceedance has occurred if (c) has not been met; or
  - (ii) An exceedance has occurred if (a) or (b) has not been met and is not corrected within fifteen (15) days of detection. Adjustments or repairs shall be made to the

solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.

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

### **D.1.6 Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

The Permittee shall maintain records to document compliance with Conditions D.1.1, D.1.2 and D.1.4. These records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit. These records shall include a minimum of the following:

The following records shall be kept for the life of the degreaser:

- (a) Owner's manuals or written maintenance and operating procedures, for the solvent cleaning machine and control equipment.
- (b) The date of installation of the solvent cleaning machine and all of its control devices.
- (c) Records of the halogenated HAP solvent content for each solvent used in the solvent cleaning machine shall be recorded monthly.

The following records shall be kept for a period of five (5) years:

- (d) Results of monitoring required in Condition D.1.4.
- (e) Information or actions taken to comply with Condition D.1.1, including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
- (f) Estimates of monthly and annual solvent consumption of the solvent cleaning machine.

Records maintained for (c) and (f) of this condition shall be taken monthly and shall be complete and sufficient to establish compliance with the NESHAP Subpart T as established in Condition D.1.2 and D.1.4

### **D.1.7 Reporting Requirements**

A summary of the information to document compliance with Conditions D.1.1 and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, and to the following address:

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

- (a) Submit an initial notification report immediately. The report shall include the following information:
  - (i) The name and address of the owner or operator;

- (ii) The address of the solvent cleaning machine;
  - (iii) A brief description of each solvent cleaning machine including machine type, solvent/air interface area, and existing controls.
  - (iv) The date of installation for the solvent cleaning machine.
  - (v) The anticipated compliance approach for the solvent cleaning machine;
  - (vi) An estimated annual halogenated HAP solvent consumption for the solvent cleaning machine.
- (b) Submit an initial statement of compliance for the solvent cleaning machine no later than 150 days after December 2, 1997. This statement shall include:
- (i) The name and address of the owner or operator;
  - (ii) The address of the solvent cleaning machine;
  - (iii) A list of the control equipment used to achieve compliance for the solvent cleaning machine.
  - (iv) A list of the parameters that are monitored and the values of these parameters measured on or during the first month after the compliance date.
  - (v) Conditions to maintain the wind speed as designated in Condition D.1.4.
- (c) Submit an annual report by February 1 of the year following the one for which the reporting is being made. This report shall include:
- (i) A signed statement from the facility owner or his designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in § 63.463(d)(10).
  - (ii) An estimate of the solvent consumption for each solvent cleaning machine during the reporting period.
- (d) Submit a semiannual exceedance report. Once an exceedance has occurred, the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency has been approved as under § 63.468(i). Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The report shall include:
- (i) Information on the actions taken to comply with monitoring conditions in Condition D.1.3, including records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels.
  - (ii) The reason for any exceedance that has occurred and description of the actions taken.

- (iii) If not exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

## SECTION D.2 FACILITY OPERATION CONDITIONS

- (a) One (1) natural gas fired boiler, identified as EU<sub>1</sub>, installed in January of 1984, with a maximum capacity of 11.7 million Btu per hour, and exhausting at one (1) stack, identified as stack SV#1.

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

#### D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from indirect heating facilities constructed after September 21, 1983 shall be limited to 0.575 tons/year.

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

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

### Compliance Determination Requirements

#### D.2.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the particulate 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 2-8-4 and 326 IAC 2-8-5.

## SECTION D.3 FACILITY OPERATION CONDITIONS

Insignificant Activities:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6
- (b) Grinding and machining operations

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

#### D.3.1 Degreasing Operations [326 IAC 8-3-6]

Pursuant to 326 IAC 8-3-6 (Open top vapor degreaser operation and control requirements), the owner or operator of an open top vapor degreaser shall ensure that the following control equipment requirements are met:

- (a) The owner or operator of an open top vapor degreaser shall ensure that the following control equipment requirements are met:

(i) Equip the degreaser with a cover that can be opened and closed easily without disturbing the vapor zone.

(ii) Equip the degreaser with the following switches:

(A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.

(B) A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).

(iii) Equip the degreaser with a permanent, conspicuous label which lists the operating requirements.

(iv) Equip the degreaser with one (1) of the following control devices:

(A) A freeboard ratio of seventy-five hundredths (0.75) or greater and a powered cover if the degreaser opening is greater than one (1) square meter (ten and eight-tenths (10.8) square feet).

(B) A refrigerated chiller.

(C) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser.

(D) A carbon adsorption system with ventilation which, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to vapor interface area and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.

(E) Other systems of demonstrated equivalent or better control as those outlined in clauses (A) through (D). Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) The owner or operator of an open top vapor degreaser shall ensure that the following operating requirements are met:

(i) Keep the cover closed at all times except when processing workloads through the degreaser.

(ii) Minimize solvent carryout emissions by:

(A) racking articles to allow complete drainage;

(B) moving articles in and out of the degreaser at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute);

(C) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;

(D) tipping out any pools of solvent on the cleaned articles before removal; and

(E) allowing articles to dry within the degreaser for at least fifteen (15) seconds or until visually dry.

(iii) Prohibit the entrance into the degreaser of porous or absorbent materials such as, but not limited to, cloth, leather, wood, or rope.

(iv) Prohibit occupation of more than one-half (1/2) of the degreaser's open top area with the workload.

(v) Prohibit the loading of the degreaser to the point where the vapor level would drop more than ten (10) centimeters (four (4) inches) when the workload is removed.

(vi) Prohibit solvent spraying above the vapor level.

(vii) Repair solvent leaks immediately or shut down the degreaser if leaks cannot be repaired immediately.

(viii) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

(ix) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements.

(x) Prohibit the use of workplace fans near the degreaser opening.

(xi) Prohibit visually detectable water in the solvent exiting the water separator.

#### D.3.2 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the Grinding and machining operations shall not exceed allowable PM emission rate 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:

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
and  
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION  
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: CMW Inc.  
Source Address: 70 S. Gray Street Indianapolis, Indiana 46201  
Mailing Address: P.O. Box 2066 Indianapolis, Indiana 46206  
FESOP No.: F097-7415-00297

**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:

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

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

**and**

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

2700 S. Belmont Ave.  
Indianapolis Indiana 46221  
Phone: 317-327-2234  
Fax: 317-327-2274

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

Source Name: CMW Inc.  
Source Address: 70 S. Gray Street Indianapolis, Indiana 46201  
Mailing Address: P.O. Box 2066 Indianapolis, Indiana 46206  
FESOP No.: F097-7415-00297

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2
<b>9</b> 1. This is an emergency as defined in 326 IAC 2-7-1(12) The Permittee must notify the ERMD and OAM, within four (4) business hours; and The Permittee must submit notice in writing or by facsimile to ERMD and OAM within two (2) days, and follow the other requirements of 326 IAC 2-8-12
<b>9</b> 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C) The Permittee must submit notice in writing within ten (10) calendar days

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR MANAGEMENT  
 COMPLIANCE DATA SECTION  
 and  
 INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION  
 AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

**FESOP Quarterly Report**

Source Name: CMW Inc.  
 Source Address: 70 S. Gray Street Indianapolis, Indiana 46201  
 Mailing Address: P.O. Box 2066 Indianapolis, Indiana 46206  
 FESOP No.: F097-7415-00297  
 Facility: Batch Vapor Degreaser  
 Parameter: Solvent Usage (Trichloroethylene)  
 Limit: 1,548 gallons per 12 month rolling sum

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR MANAGEMENT  
 COMPLIANCE DATA SECTION  
 and  
 INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION  
 AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY COMPLIANCE REPORT**

Source Name: CMW Inc.  
 Source Address: 70 S. Gray Street Indianapolis, Indiana 46201  
 Mailing Address: P.O. Box 2066 Indianapolis, Indiana 46206  
 FESOP No.: F097-7415-00297

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the 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".

**LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:**

Requirement (eg. 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.

## Environmental Resources Management Division Air Quality Management Section

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

#### Source Background And Description

**Source Name:** *CMW Inc.*  
**Source Location:** *70 S. Gray Street Indianapolis, IN 46201*  
**County:** *Marion*  
**SIC Code:** *3643, 3356, 3548*  
**Operation Permit No.:** *F097-7415-00297*  
**Permit Reviewer:** *Kevin Leone*

The Environmental Resource Management Division (ERMD), Air Quality Management Section has reviewed a Federally Enforceable State Operating Permit (FESOP) application from CMW Inc. relating to the operation metals welding with processes including: silver extrusion, metal forming brazing, metal powder mixing, powder pressing, sintering, metal machining, cold heading, cleaning, degreasing.

#### Permitted Emission Units and Pollution Control Equipment

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

- (1) One (1) natural gas fired boiler, identified as EU<sub>1</sub>, installed in January of 1984 with a maximum capacity of 11.7 million Btu per hour, and exhausting at one (1) stack, identified as stack SV#1.

#### Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

- (1) One (1) batch vapor degreaser using trichloroethylene, identified as EU<sub>9</sub>, installed in March of 1978, with a solvent/air interface area of greater than 13 feet, exhausting at one stack, identified as SV#5.

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

- (1) One (1) batch vapor degreaser using trichloroethylene, identified as EU<sub>9</sub>, installed in March of 1978, with a solvent/air interface area of greater than 13 feet, exhausting at one stack, identified as SV#5.

#### Insignificant Activities

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

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million Btu Per hour.

- (2) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6, (One (1) trichloroethylene degreaser).
- (3) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (4) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (5) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (6) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (7) Noncontact cooling tower systems with forced and induced draft cooling tower system not regulated under a NESHAP.
- (8) Paved and unpaved roads and parking lots with public access.
- (9) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (10) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. Specific processes include: graphite fixture fabricating area with emission unit ID's EU2 through EU7, and machine shop with emission unit ID's EU10 through EU34.
- (11) A laboratory as defined in 326 IAC 2-7-1(20)(c).

### **Existing Approvals**

This source has been operating under the following approvals:

- (1) Operating permit number 5023, issued on September 20<sup>th</sup>, 1993.

### **Enforcement Issue**

- (a) ERMD is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:
  - (1) One (1) vapor degreaser, installed in March of 1978, exhausting at one stack, identified as stack/vent ID #5.
- (b) ERMD is reviewing this matter and will take appropriate action. This proposed permit will also satisfy the requirements of the construction permit rules.

## Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on August 11<sup>th</sup>, 1997.

## Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations pages 1-4 in Appendix A.

## Potential Emissions

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

Pollutant	Potential Emissions (tons/year)
PM	< 100
PM-10	< 100
SO <sub>2</sub>	< 100
VOC	< 100
CO	< 100
NO <sub>x</sub>	< 100

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

HAP	Potential Emissions (tons/year)
Trichloroethylene	33
Methyl Ethyl Ketone	0.71
TOTAL	33.71

See attached spreadsheets for detailed calculations.

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

(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 emissions are not counted toward determination of PSD and Emission Offset applicability.

**Limited Potential To Emit**

The permit contains provisions that allow the source to use daily records to document compliance with limitations that correspond to 99 tons.

The source has accepted a limit on potential to emit of 9.4 tons per 12 month rolling sum for any single HAP and 24 tons per 12 month rolling sum for any combination of HAPs.

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

	Limited Potential to Emit (tons/year)						
Process/ facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	Single HAP
Boiler	0.72	0.72	0.03	0.12	1.79	7.17	
Vapor Degreaser				9.4			9.4 tons of trichloroethylene
Insignificant Activities	1.66	1.66		3.37			1 ton of Methyl Ethyl Ketone
Total Emissions	2.38	2.38	0.03	12.77	1.79	7.17	9.4 tons trichloroethylene; less than 24 tons of any combination of HAPs

Attached Table A summarizes the permit conditions and requirements.

**County Attainment Status**

The source is located in Marion County.

Pollutant	Status
TSP	Nonattainment
PM-10	attainment
SO <sub>2</sub>	attainment

NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

- (a) The boiler identified as EU #1 is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40, Subpart Dc), because date of construction commenced before June 9<sup>th</sup>, 1989.
- (b) The batch vapor degreaser, identified as EU#9, is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63 Subpart T) since it uses trichloroethylene as the cleaning agent. This batch vapor degreaser was installed prior to 11/29/93; thus, the source shall be in compliance with this subpart no later than 12/2/97.

The batch vapor degreasing operations are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 14, (40 CFR 63, Subpart T, and 326 IAC 20-1-1). This facility is subject to 326 IAC 20-1-1 because it is a source area MACT. Pursuant to 40 CFR 63, Subpart T, and 326 IAC 20-1-1, the vapor degreasing operations are subject to the following conditions:

- (1) Reduce the room draft as described in §63.463(e)(2)(ii).
- (2) A freeboard ratio of 0.75 or greater shall be maintained.
- (3) An automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts shall be installed.
- (4) The degreaser shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
- (5) The degreaser shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
- (6) The degreaser shall have a primary condenser.
- (7) A combination of controls, including a freeboard refrigeration device, reduced room draft, and a freeboard ratio of 1.0 shall be used.

- (8) Monitoring shall be conducted of each control device used.
- (c) The compliance monitoring requirements applicable to this source are as follows:
- (1) Ensure weekly that the chilled air blanket temperature measured at the center of the air blanket of the freeboard refrigeration device is no greater than thirty percent (30%) of the solvent's boiling point. A thermometer or thermocouple shall be used to measure the temperature at the center of the air blanket during the idling mode.
  - (2) Ensure that flow or movement of air across the top of the freeboard area of the solvent cleaning machine , or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time, as measured using the procedures in § 63.466(d).
    - (i) The Permittee shall conduct initial and quarterly monitoring of wind speed within six (6) inches above the top of the freeboard area of the solvent cleaning machine as follows:
      - (A) Determine the direction of the wind current by slowly rotating a velometer or similar device until the maximum speed is located;
      - (B) Orient a velometer in the direction of the wind current at each of the four corners of the machine;
      - (C) Record the reading for each corner;
      - (D) Average the values obtained at each corner and record the average wind speed.
- (c) Establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 feet per minute) or less as described in § 63.466(d).
  - (i) Monitor initially and weekly, the room parameters established during the initial compliance test that are used to achieve the reduced room draft.
- (d) Monitor the hoist speed as follows:
  - (i) Determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).
  - (ii) Monitoring shall be conducted monthly. If after the first year, no exceedances of the hoist speed are measured, the owner or operator may begin monitoring the hoist speed quarterly.
  - (iii) If an exceedance of the hoist speed occurs during quarterly monitoring, the monitoring frequency returns to monthly until another year of compliance without an exceedance is demonstrated.

- (iv) If an owner or operator can demonstrate to EPA's satisfaction in the initial compliance report that the hoist cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including during the first year of compliance.
- (d) If any of the requirements of the above (a, b, or c) are not met, the Permittee shall determine whether an exceedance has occurred.
  - (i) An exceedance has occurred if (c) has not been met; or
  - (ii) An exceedance has occurred if (a) or (b) has not been met and is not corrected within fifteen (15) days of detection. Adjustments or repairs shall be made to the solvent cleaning system or control device to reestablish required levels. The parameter must be remeasured immediately upon adjustment or repair and demonstrated to be within required limits.
- (d) The batch vapor degreasing operations shall be subject to the record keeping and reporting requirement as indicated in the NESHAP (40 CFR 63 Subpart T).

#### **State Rule Applicability - Entire Source**

##### 326 IAC 2-6 (Emission Reporting)

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

##### 326 IAC 5-1 (Visible Emissions Limitations)

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

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

#### **State Rule Applicability - Individual Facilities**

##### 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions from indirect heating facilities constructed after September 21, 1983 shall be limited by the following equation:

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

Where "Pt" equals particulate emissions of 0.575

Where "Q" equals heat input rate of 11.7 in mmBtu/hr

**326 IAC 8-3-6 (Organic Solvent Degreasing Operations)**

Pursuant to 326 IAC 8-3-6 (Organic Solvent Degreasing Operations), an owner or operator of a open top vapor degreaser shall ensure that the control equipment requirements stated in this rule are met.

**326 IAC 6-3-2 (Process Operations)**

The particulate matter (PM) from the graphite fixture fabricating area with emission unit ID's EU2 through EU7 and machine shop processes with emission unit ID's EU10 through EU34 shall be limited by the following:

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

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

**Air Toxic Emissions**

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

This source has accepted federally enforceable air toxic emission limits of 9.4 tons per 12 month rolling sum for any single HAP.

**Conclusion**

The operation of this silver extrusion, metal forming brazing, metal powder mixing, powder pressing, sintering, metal machining, cold heading, cleaning and degreasing facility will be subject to the conditions of the attached proposed FESOP No. F097-7415-00297.

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

11.7

102.5

EU#1

Pollutant	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	14.0	14.0	0.6	140.0	2.4	35.0
Potential Emission (lbs/day)	3.93	3.93	0.17	39.31	0.68	9.83
Potential Emission(tons/yr)	0.72	0.72	0.03	7.17	0.12	1.79

PM emissions are limited by 326 IAC 6-2 Indirect Heaters

### 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

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EU#9

Substance	Usage gal/day	Density lb/gal	Precent VOC by Wt.	Potential VOC Emissions	
				lbs/day	tons/yr
Trichloroethylene	14.45	12.13	100.00%	175.28	31.99

Insignificant Activities EU# 2-8,10-34

Pollutant for EU#2-7	PM	VOC
Potential Emission (lbs/day)	1.03	
Potential Emission(tons/yr)	0.13	
Potential Emission(Gr/DSCF)	0.014	

Pollutant for EU#8	PM	VOC
Potential Emission (lbs/day)		2.18
Potential Emission(tons/yr)		1.19

Pollutant for EU#10-34	PM	VOC
Potential Emission (lbs/day)	0.43	
Potential Emission(tons/yr)	0.05	
Potential Emission(Gr/DSCF)	0.002	

Maximum Potential to Emit

Pollutant	PM	VOC	SingleHAP	ComboHAP
Potential Emission (lbs/day)	5.39	178.14	175.28	179.17
Potential Emission(tons/yr)	0.90	33.30	31.99	32.70

Limited Potential to Emit

Pollutant	PM	VOC	SingleHAP	ComboHAP
Potential Emission (lbs/day)			51.43	
Potential Emission(tons/yr)			9.40	

Limit on Trichloroethylene solvent consumption limited to 1,548 gallons per 12 month rolling sum. This throughput limit is equal to 9.4 tons of trichloroethylene per 12 month rolling sum.