

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR MANAGEMENT**

**Peerless Pottery, Inc.  
North Lincoln Avenue  
Rockport, Indiana 47635**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F147-7890-00010	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and 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 vitreous china plumbing fixtures manufacturing plant.

Responsible Official: Peerless Pottery, Inc.  
Source Address: North Lincoln Avenue, Rockport, Indiana 47635  
Mailing Address: P. O. Box 145, Rockport, Indiana 47635  
SIC Code: 3261  
County Location: Spencer  
County Status: Attainment for all criteria pollutants  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD

### 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) two (2) 3.92 million British thermal units per hour natural gas fired firing kilns, identified as K-1 and K-2, each with a maximum capacity of processing 0.76 tons of ceramic per hour, and each exhausting through two (2) stacks (ID Nos. B10CS1 and B10CS2 for K-1, ID Nos. B10BS7 and B10BS9 for K-2);
- (b) one (1) 3.92 million British thermal units per hour natural gas fired firing kiln, identified as K-3, with a maximum capacity of processing 0.55 tons of ceramic per hour, and exhausting through two (2) stacks (ID Nos. B10BS1 and B10BS2);
- (c) one (1) 20 million British thermal units per hour natural gas fired firing kiln, identified as K-4, with a maximum capacity of processing 2.59 tons of ceramic per hour, and exhausting through two (2) stacks (ID Nos. B10BS1 and B10BS2);
- (d) one (1) 5.0 million British thermal units per hour natural gas fired refire kiln, identified as RK-1, with a maximum capacity of processing 0.11 tons of ceramic per hour, and exhausting through three (3) stacks (ID Nos. B10CS3, B10CS4 and B10CS5);
- (e) one (1) tank casting and scraping station, identified as B2P3T, with a maximum capacity of processing 133 tanks per hour, located in Building B2;
- (f) one (1) bowl casting and scraping station, identified as B3P3B, with a maximum capacity of processing 288 bowls per hour, located in Building B3;
- (g) one (1) urinal casting and scraping station, identified as B4P3U, with a maximum capacity of processing 8 urinals per hour, located in Building B4;
- (h) one (1) tank casting and scraping station, identified as B4P3T, with a maximum capacity of processing 165 tanks per hour, located in Building B4;
- (i) one (1) lavatory casting and scraping station, identified as B4P3L, with a maximum capacity of processing 66.2 lavatories per hour, located in Building B4;
- (j) one (1) bowl casting and scraping station, identified as B4P3B, with a maximum capacity of processing 56 bowls per hour, located in Building B4;
- (k) one (1) manual glaze spray booth, identified as B7P5M1, with a maximum capacity of spraying 450 pounds of glaze per hour, using a baghouse, identified as B7C2, for overspray control, exhausting at one (1) stack (ID No. B7);
- (l) one (1) manual glaze spray booth, identified as B7P5M2, with a maximum capacity of spraying 450 pounds of glaze per hour, using a baghouse, identified as B7C3, for overspray control, and exhausting at one (1) stack (ID No. B7);

- (m) one (1) double automated glaze spray booth, identified as B7P5A1, with a maximum capacity of spraying 2550 pounds of glaze per hour, using a baghouse, identified as B7C5, for overspray control, and exhausting at one (1) stack (ID No. B7S22);
- (n) one (1) automated glaze spray booth, identified as B7P5A2, with a maximum capacity of spraying 1275 pounds of glaze per hour, using a waterwash for overspray control, and exhausting at one (1) stack (ID No. B7S1); and
- (o) one (1) automated glaze spray booth, identified as B7P5A3, with a maximum capacity of spraying 1275 pounds of glaze per hour, using a waterwash for overspray control, and exhausting at one (1) stack (ID No. B7S2).

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

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

- (a) one (1) natural gas fired dryer, with a rated capacity of 2.5 million British thermal units per hour;
- (b) application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (c) degreasing operations that do not exceed 145 gallons per 12 months;
- (d) closed loop heating and cooling systems;
- (e) activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume;
- (f) water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs;
- (g) replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (h) paved and unpaved roads and parking lots with public access;
- (i) 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;
- (j) mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degree C);
- (k) farm operations;
- (l) one (1) inspection and bowl trap glazing booth, identified as B7P4M1, with overspray controlled by Baghouses B7C1 and B7C5;
- (m) one (1) inspection booth, identified as B10AP4M1, with overspray controlled by Baghouse B10AC1;
- (n) one (1) inspection and reconditioning booth, identified as B10DP4M1, with overspray controlled by Baghouse B10DC1;
- (o) mold making activities;
- (p) one (1) silo containment system, with dust controlled by a passive baghouse, identified as B5C1;
- (q) one (1) reclaim crusher, with dust controlled by Baghouse B5C3;
- (r) one (1) blunger, with dust controlled by a passive baghouse, identified as B5C2; and
- (s) glaze mix-up operation, with dust controlled by a filter system.

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

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

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

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

## **SECTION B                    GENERAL CONDITIONS**

### **B.1    General Requirements [IC 13-15] [IC 13-17]**

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

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

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

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

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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)] [326 IAC 2-8-7(a)(3)]**

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- (a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
- (b) Indiana rules from 326 IAC quoted in conditions in this permit are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

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

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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)]**

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

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

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

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

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

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

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

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

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

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) This certification shall be submitted on the attached Certification Form.
- (c) A responsible official is defined at 326 IAC 2-7-1(33).

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

- (a) The Permittee shall annually certify that this source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall be submitted in letter form no later than July 1 of each year to:

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

- (b) This annual compliance certification report required by this permit shall be timely if delivered by any method and received and stamped by IDEM, OAM on or before the date it is due. [326 IAC 2-5-3]
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM may require to determine the compliance status of the source.
- (d) The Permittee shall also annually certify that this source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.

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

- (a) The Permittee shall prepare, maintain and implement Preventive Maintenance Plans (PMP) within ninety (90) days after the issuance of this permit, including the following information on each:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;
  - (4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and
  - (5) Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.
- (b) PMPs shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

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, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone 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

Failure to notify IDEM, OAM 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

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 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 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 corrective actions or preventive measures taken shall be reported to:

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

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

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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- (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 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 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 at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include, at minimum, the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(20).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) The Permittee has a duty to submit a timely and complete permit renewal application. A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) Delivered by any method and received and stamped by IDEM, OAM on or before the date it is due. [326 IAC 2-5-3]

- (2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect 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 takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM any additional information identified as needed to process the application.

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

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- (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, 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)]**

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- (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).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM 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)]**

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- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.

- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by U.S. EPA, as they apply to permit issuance and renewal.

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

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 in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

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

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

- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable 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]

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

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

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, 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 within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner.
- (c) IDEM, OAM 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, consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, revocation of this permit, referral to the Office of Attorney General for collection, or other appropriate measures.
- (c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.
- (d) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-5674 (ask for OAM, Data Support Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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

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

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

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6.

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

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

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

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

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

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

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

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- (a) The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), that apply to all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.
- (b) Stacks shall be constructed using good engineering practice (GEP) according to the following equation:

$$S = H + 1.5 (L) \quad \text{where: } S = \text{Stack height, (feet)}$$

H = Height of supporting or nearby structure  
(whichever is largest), (feet)

L = Lesser dimension (height or width) of  
the structure chosen for H, (feet)

- (c) Any changes in the applicable stacks require prior approval from IDEM, OAM.

**C.8 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]  
[40 CFR 61, Subpart M]**

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

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

**C.9 Performance Testing [326 IAC 3-2.1]**

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

The test protocol shall be submitted to:

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

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

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

#### **C.10 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 in accordance with the provisions of 326 IAC 2-8-4(3). The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

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

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

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

#### **C.11 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]**

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- (a) The Permittee shall perform all necessary maintenance and make all necessary and reasonable attempts to keep all required monitoring equipment in proper operating condition at all times.
- (b) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, 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.
- (c) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment.
- (d) Preventive Maintenance Plans of the monitors shall be implemented. In addition, prompt corrective action shall be initiated whenever indicated.

#### **C.12 Monitoring Methods [326 IAC 3]**

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

### C.13 Pressure Gauge Specifications

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Whenever a condition in this permit requires the taking of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

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

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) Written notification is to be sent on a form provided by the commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) asbestos removal or demolition start date;
    - (B) removal or demolition contractor; or
  - (3) Waste disposal site.
- (c) The Permittee shall postmark or deliver the notice according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

**C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
within ninety (90) days from the date of issuance of this permit.  
  
within 180 days from the date on which this source commences operation).
- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such a plan.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

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If a regulated substance is present in more than the threshold quantity that is subject to 40 CFR 68, 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 part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

C.17 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) The Preventive Maintenance Plan described in Section B, Preventive Maintenance Plan, of this permit.
- (b) For each compliance monitoring condition of this permit appropriate corrective actions, as described in the Preventive Maintenance Plan, shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the corrective actions within the prescribed time contained within the Preventive Maintenance Plan shall constitute a violation of the permit unless taking the corrective action set forth in the Preventive Maintenance Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee may be excused from taking further corrective action for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further corrective actions providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The Permittee determines that the process has already returned to operating within "normal" parameters and no corrective action is required.
- (d) Records shall be kept of all instances in which the action values were not met and of all corrective actions taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.18 Actions Related to Noncompliance Demonstrated by a Stack Test**

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

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

**C.19 Monitoring Data Availability**

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

**C.20 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]**

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- (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 representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.

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

C.21 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

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

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

### **Stratospheric Ozone Protection**

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

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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) two (2) 3.92 million British thermal units per hour natural gas fired firing kilns, identified as K-1 and K-2, each with a maximum capacity of processing 0.76 tons of ceramic per hour, and each exhausting through two (2) stacks (ID Nos. B10CS1 and B10CS2 for K-1, ID Nos. B10BS7 and B10BS9 for K-2);
- (b) one (1) 3.92 million British thermal units per hour natural gas fired firing kiln, identified as K-3, with a maximum capacity of processing 0.55 tons of ceramic per hour, and exhausting through two (2) stacks (ID Nos. B10BS1 and B10BS2);
- (c) one (1) 20 million British thermal units per hour natural gas fired firing kiln, identified as K-4, with a maximum capacity of processing 2.59 tons of ceramic per hour, and exhausting through two (2) stacks (ID Nos. B10BS1 and B10BS2);
- (d) one (1) 5.0 million British thermal units per hour natural gas fired refire kiln, identified as RK-1, with a maximum capacity of processing 0.11 tons of ceramic per hour, and exhausting through three (3) stacks (ID Nos. B10CS3, B10CS4 and B10CS5);
- (e) one (1) tank casting and scraping station, identified as B2P3T, with a maximum capacity of processing 133 tanks per hour, located in Building B2;
- (f) one (1) bowl casting and scraping station, identified as B3P3B, with a maximum capacity of processing 288 bowls per hour, located in Building B3;
- (g) one (1) urinal casting and scraping station, identified as B4P3U, with a maximum capacity of processing 8 urinals per hour, located in Building B4;
- (h) one (1) tank casting and scraping station, identified as B4P3T, with a maximum capacity of processing 165 tanks per hour, located in Building B4;
- (i) one (1) lavatory casting and scraping station, identified as B4P3L, with a maximum capacity of processing 66.2 lavatories per hour, located in Building B4;
- (j) one (1) bowl casting and scraping station, identified as B4P3B, with a maximum capacity of processing 56 bowls per hour, located in Building B4;
- (k) one (1) manual glaze spray booth, identified as B7P5M1, with a maximum capacity of spraying 450 pounds of glaze per hour, using a baghouse, identified as B7C2, for overspray control, exhausting at one (1) stack (ID No. B7);
- (l) one (1) manual glaze spray booth, identified as B7P5M2, with a maximum capacity of spraying 450 pounds of glaze per hour, using a baghouse, identified as B7C3, for overspray control, and exhausting at one (1) stack (ID No. B7);
- (m) one (1) double automated glaze spray booth, identified as B7P5A1, with a maximum capacity of spraying 2550 pounds of glaze per hour, using a baghouse, identified as B7C5, for overspray control, and exhausting at one (1) stack (ID No. B7S22);
- (n) one (1) automated glaze spray booth, identified as B7P5A2, with a maximum capacity of spraying 1275 pounds of glaze per hour, using a waterwash for overspray control, and exhausting at one (1) stack (ID No. B7S1); and
- (o) one (1) automated glaze spray booth, identified as B7P5A3, with a maximum capacity of spraying 1275 pounds of glaze per hour, using a waterwash for overspray control, and exhausting at one (1) stack (ID No. B7S2).

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

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the facilities covered under Section D.1 shall not exceed the emission rates listed below when the facilities are operated at the listed corresponding maximum process weight rate:

Source ID	Source Description	Allowable Emissions (lb/hr)	Maximum Process Weight Rate (ton/hr)
(a) K-1	Firing Natural Gas Fired Kiln	0.40	0.76
(a) K-2	Firing Natural Gas Fired Kiln	0.40	0.76
(b) K-3	Firing Natural Gas Fired Kiln	0.29	0.55
(c) K-4	Firing Natural Gas Fired Kiln	1.36	2.59
(d) RK-1	Refire Natural Gas Fired Kiln	0.01	0.11
(e) B2P3T	Tank Casting Scraping	1.81	2.35
(f) B3P3B	Bowl Casting Scraping	10.35	4.67
(g) B4P3U	Urinal Casting Scraping	0.29	0.10
(h) B4P3T	Tank Casting Scraping	2.25	2.91
(i) B4P3L	Lavatory Casting Scraping	0.38	0.68
(j) B4P3B	Bowl Casting Scraping	2.01	0.91
(k) B7P5M1	Manual Glaze Booth	0.09	0.84
(l) B7P5M2	Manual Glaze Booth	0.09	0.84
(m) B7P5A1	Double Automated Glaze Booth	0.52	4.78
(n) B7P5A2	Automated Glaze Booth	3.90	2.39
(o) B7P5A3	Automated Glaze Booth	3.90	2.39

**D.1.2 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 these facilities and their control devices.

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

**D.1.3 Visible Emissions Notations**

- (a) Daily visible emission notations of the stack exhausts of all facilities covered under Section D.1 shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Preventive Maintenance Plan for these units shall contain troubleshooting

contingency and corrective actions for when an abnormal emission is observed.

#### D.1.4 Parametric Monitoring

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The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the glaze spray booths B7P5M1, B7P5M2 and B7P5A1 at least once weekly when the glaze spraying processes in these booths are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 1.0 and 3.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

#### D.1.5 Baghouse Inspections

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An inspection shall be performed each calendar quarter of all bags controlling the facilities covered under Section D.1, excluding baghouses listed in D.1.4. All defective bags shall be replaced.

#### D.1.6 Broken Bag or Failure Detection

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In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
- (b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

#### D.1.7 Raw Material (Clay) Usage

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Usage of clay, which is the main ingredient of the products at the source, shall not exceed 3,011 tons per month. Compliance with Operation Conditions D.1.1, D.1.7 and D.2.1 shall also render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Program) not applicable.

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

#### D.1.8 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.4, the Permittee shall maintain records of daily visible emission notations of the stack exhausts of all facilities covered under Section D.1.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure.
  - (2) Documentation of all corrective actions implemented, per event .

- (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
  - (4) Quality Assurance/Quality Control (QA/QC) procedures.
  - (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.
  - (7) Equipment "troubleshooting" contingency plan.
- (c) To document compliance with Condition D.1.5, the Permittee shall maintain records of the results of the inspections required under Condition D.1.5.
  - (d) To document compliance with Condition D.1.7, the Permittee shall maintain records of the monthly clay usage.
  - (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.7, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.2 FACILITY OPERATION CONDITIONS

- (a) one (1) inspection and bowl trap glazing booth, identified as B7P4M1, with overspray controlled by Baghouses B7C1 and B7C5;
- (b) one (1) inspection booth, identified as B10AP4M1, with overspray controlled by Baghouse B10AC1;
- (c) one (1) inspection and reconditioning booth, identified as B10DP4M1, with overspray controlled by Baghouse B10DC1;
- (d) mold making activities;
- (e) one (1) silo containment system, with dust controlled by a passive baghouse, identified as B5C1;
- (f) one (1) reclaim crusher, with dust controlled by Baghouse B5C3;
- (g) one (1) blunger, with dust controlled by a passive baghouse, identified as B5C2; and
- (h) glaze mix-up operation, with dust controlled by a filter system.

### Process Weight Activities

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

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each of the facilities (insignificant activities) covered under Section D.2 shall not exceed allowable PM emission rate of 1.07 pounds per hour.

#### **Compliance Determination Requirement**

##### D.2.2 Testing Requirements [326 IAC 2-8-5(1)]

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

State Form 47738 (5-96)

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

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

Source Name: Peerless Pottery, Inc.  
Source Address: North Lincoln Avenue, Rockport, Indiana 47635  
Mailing Address: P. O. Box 145, Rockport, Indiana 47635  
FESOP No.: F147-7890-00010

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

State Form 47739 (5-96)

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

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

Source Name: Peerless Pottery, Inc.  
 Source Address: North Lincoln Avenue, Rockport, Indiana 47635  
 Mailing Address: P. O. Box 145, Rockport, Indiana 47635  
 FESOP No.: F147-7890-00010

If a deviation has occurred, a separate copy of this report must be submitted for <b>each</b> monitoring device on all control equipment listed in this permit. Attach a signed certification to complete this report.	
Stack/Vent ID:	
Control Equipment: (ex: thermal oxidizer, scrubber, baghouses)	
Type of Parameter Monitored: (ex: temperature, pressure drop, efficiency)	
9 Continuously	9 Periodically, at a frequency of:
Parameter Operating Restrictions/Range: (ex: 1,400°F, 2-4 psi pressure drop)	
Report Covers From: (date: month/day/yr)	To:
9 Summary of Deviations from the Parameter Restriction/Range During the Monitoring Period are Identified Below. Complete Records Maintained at the Facility.	

	For Parameter Recorded Continuously	For Parameter Recorded Periodically
Total Unit Operating Time		
Total Time of Deviations (Identify All Deviations)		
Percent of Time Indicating Deviations ([2]/[1]x100)		

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

State Form 47741 (5-96)

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

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

Source Name: Peerless Pottery, Inc.  
Source Address: North Lincoln Avenue, Rockport, Indiana 47635  
Mailing Address: P. O. Box 145, Rockport, Indiana 47635  
FESOP No.: F147-7890-00010

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

Stack/Vent ID:
Equipment/Operation:
Parameter Subject to Material Type, Quantity Usage or Operation Limitations Specified in the Permit: (ex: 2500 lb/day, 300 hours/yr, 5000 gallons/month)
Determination Period for this Parameter: (ex: 365-day rolling sum, fixed monthly rate)
<b>9</b> Permit Has No Rate Limitations for this Parameter.
Content Restriction for this Parameter: (ex: maximum of 40% VOC in inks, 0.5% sulfur content)
Demonstration Method for this Parameter: (ex: MSDS, Supplier, material sampling & analysis)
<b>9</b> Permit Has No Content Limitations for this Parameter.
Comments:

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

**FESOP Quarterly Report**

Source Name: Peerless Pottery, Inc.  
Source Address: North Lincoln Avenue, Rockport, Indiana 47635  
Mailing Address: P. O. Box 145, Rockport, Indiana 47635  
FESOP No.: F147-7890-00010  
Facility: Source wide material usage  
Parameter: Clay usage  
Limit: 3,011 tons per month

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

Month	Clay Usage for the Month (tons)
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

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

#### Source Background And Description

**Source Name:** Peerless Pottery, Inc.  
**Source Location:** North Lincoln Avenue, Rockport, IN 47635  
**County:** Spencer  
**SIC Code:** 3261  
**Operation Permit No.:** F147-7890-00010  
**Permit Reviewer:** Scott Pan/EVP

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Peerless Pottery, Inc. relating to the operation of a vitreous china plumbing fixtures manufacturing plant.

#### Permitted Emission Units and Pollution Control Equipment

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

- (a) two (2) 3.92 million British thermal units per hour natural gas fired firing kilns, identified as K-1 and K-2, each with a maximum capacity of processing 0.76 tons of ceramic per hour, and each exhausting through two (2) stacks (ID Nos. B10CS1 and B10CS2 for K-1, ID Nos. B10BS7 and B10BS9 for K-2);
- (b) one (1) 3.92 million British thermal units per hour natural gas fired firing kiln, identified as K-3, with a maximum capacity of processing 0.55 tons of ceramic per hour, and exhausting through two (2) stacks (ID Nos. B10BS1 and B10BS2);
- (c) one (1) 20 million British thermal units per hour natural gas fired firing kiln, identified as K-4, with a maximum capacity of processing 2.59 tons of ceramic per hour, and exhausting through two (2) stacks (ID Nos. B10BS1 and B10BS2);
- (d) one (1) 5.0 million British thermal units per hour natural gas fired refire kiln, identified as RK-1, with a maximum capacity of processing 0.11 tons of ceramic per hour, and exhausting through three (3) stacks (ID Nos. B10CS3, B10CS4 and B10CS5);
- (e) one (1) tank casting and scraping station, identified as B2P3T, with a maximum capacity of processing 133 tanks per hour, located in Building B2;
- (f) one (1) bowl casting and scraping station, identified as B3P3B, with a maximum capacity of processing 288 bowls per hour, located in Building B3;
- (g) one (1) urinal casting and scraping station, identified as B4P3U, with a maximum capacity of processing 8 urinals per hour, located in Building B4;
- (h) one (1) tank casting and scraping station, identified as B4P3T, with a maximum capacity of processing 165 tanks per hour, located in Building B4;
- (i) one (1) lavatory casting and scraping station, identified as B4P3L, with a maximum capacity of processing 66.2 lavatories per hour, located in Building B4;
- (j) one (1) bowl casting and scraping station, identified as B4P3B, with a maximum capacity of processing 56 bowls per hour, located in Building B4;
- (k) one (1) manual glaze spray booth, identified as B7P5M1, with a maximum capacity of spraying 450 pounds of glaze per hour, using a baghouse, identified as B7C2, for overspray control, exhausting at one (1) stack (ID No. B7);

- (l) one (1) manual glaze spray booth, identified as B7P5M2, with a maximum capacity of spraying 450 pounds of glaze per hour, using a baghouse, identified as B7C3, for overspray control, and exhausting at one (1) stack (ID No. B7);
- (m) one (1) double automated glaze spray booth, identified as B7P5A1, with a maximum capacity of spraying 2550 pounds of glaze per hour, using a baghouse, identified as B7C5, for overspray control, and exhausting at one (1) stack (ID No. B7S22);
- (n) one (1) automated glaze spray booth, identified as B7P5A2, with a maximum capacity of spraying 1275 pounds of glaze per hour, using a waterwash for overspray control, and exhausting at one (1) stack (ID No. B7S1); and
- (o) one (1) automated glaze spray booth, identified as B7P5A3, with a maximum capacity of spraying 1275 pounds of glaze per hour, using a waterwash for overspray control, and exhausting at one (1) stack (ID No. B7S2).

### **Unpermitted Emission Units and Pollution Control Equipment**

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

### **Insignificant Activities**

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

- (a) one (1) natural gas fired dryer, with a rated capacity of 2.5 million British thermal units per hour;
- (b) application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (c) degreasing operations that do not exceed 145 gallons per 12 months;
- (d) closed loop heating and cooling systems;
- (e) activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume;
- (f) water based adhesives that are less than or equal to 5 percent by volume of VOCs excluding HAPs;
- (g) replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (h) paved and unpaved roads and parking lots with public access;
- (i) 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;
- (j) mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degree C);
- (k) farm operations;
- (l) one (1) inspection and bowl trap glazing booth, identified as B7P4M1, with overspray controlled by Baghouses B7C1 and B7C5;
- (m) one (1) inspection booth, identified as B10AP4M1, with overspray controlled by Baghouse B10AC1;
- (n) one (1) inspection and reconditioning booth, identified as B10DP4M1, with overspray controlled by Baghouse B10DC1;
- (o) mold making activities;
- (p) one (1) silo containment system, with dust controlled by a passive baghouse, identified as B5C1;
- (q) one (1) reclaim crusher, with dust controlled by Baghouse B5C3;
- (r) one (1) blunger, with dust controlled by a passive baghouse, identified as B5C2; and
- (s) glaze mix-up operation, with dust controlled by a filter system.

### Existing Approvals

This source has been operating under the following approvals:

- (a) Operation Permit No. 74-04-93-0084 issued on December 19, 1989;
- (b) Registration Letter CP 147-2588 issued on July 16, 1993; and
- (c) Registration Letter CP 147-3471-00010 issued on February 22, 1994.

### Enforcement Issue

There are no Enforcement actions pending.

### Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on December 16, 1996.

### Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations (6 pages).

### 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	680.0
PM-10	680.0
SO <sub>2</sub>	0.0
VOC	8.8
CO	67.6
NO <sub>x</sub>	12.1

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

See attached spreadsheets for detailed calculations (page 1 of Appendix A).

HAP	Potential Emissions (tons/year)
HF	9.4
TOTAL	9.4

See attached spreadsheets for detailed calculations (page 1 of Appendix A).

- (a) The potential emissions (as defined in the Indiana Rule) of particulate matter less than 10 micron in diameter are equal to or greater than 100 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.

**Limited Potential To Emit**

- (a) The source has accepted a federally enforceable limit on potential to emit PM-10 of 99 tons per year, consisting of:
  - (i) 57.2 tons per year for the significant activities; and
  - (ii) 35.2 tons per year for the insignificant activities.
- (b) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Firing Kiln	5.00	5.00	0.00	4.39	33.68	5.51	4.69
Refire Kiln	0.02	0.02	0.00	0.00	0.00	0.00	0.00
Glaze Application	17.35	17.35	0.00	0.00	0.00	0.00	0.00
Casting and Scraping	34.88	34.88	0.00	0.00	0.00	0.00	0.00
Insignificant Activities	35.17	35.17	0.00	0.00	0.00	0.00	0.00
Total Emissions	92.42	92.42	0.00	4.39	33.68	5.51	4.69

Attached Tables A and B summarize the permit conditions and requirements.

**County Attainment Status**

The source is located in Spencer County.

Pollutant	Status
TSP	attainment
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. Spencer County has been designated as attainment or unclassifiable for ozone.
- (b) PSD Requirements  
The emissions from this stationary source were reviewed both under the requirements of the Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed sources 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 emissions are not counted toward determination of PSD and Emission Offset applicability.

#### **Federal Rule Applicability**

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

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

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

This source is located in Spencer County and the potential to emit VOC and NO<sub>x</sub> is each less than 100 tons per year. This source is not one of the 28 listed sources and its potential to emit PM10 is less than one-hundred (100) tons per year without adding fugitive emissions (PM10 emissions are controlled to less than 100 tons per year for FESOP). Therefore, 326 IAC 2-6 does not apply.

##### 326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). The source will have controlled emissions for any criteria pollutant less than 100 tons per year (see page 1 of Appendix A). These controlled emissions will render 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

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

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

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

**State Rule Applicability - Individual Facilities**

326 IAC 6-3-2 (Particulate Emission Limitations)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations), particulate matter emissions from particulate emissions facilities covered under the proposed FESOP shall not exceed the allowable emissions listed below (see detailed calculations in page 5 of Appendix A). The table below also lists the maximum process weight rates and controlled emissions for these facilities, indicating that all these facilities will be operated in compliance with 326 IAC 6-3-2.

Source ID	Source Description	Allowable Emissions (lb/hr)	Maximum Process Weight Rate (ton/hr)	Maximum Emissions (lb/hr)
K-1	Firing Natural Gas Fired Kiln	0.40	0.76	0.37
K-2	Firing Natural Gas Fired Kiln	0.40	0.76	0.37
K-3	Firing Natural Gas Fired Kiln	0.29	0.55	0.27
K-4	Firing Natural Gas Fired Kiln	1.36	2.59	1.27
RK-1	Refire Natural Gas Fired Kiln	0.01	0.11	0.01
B7P5M1	Manual Glaze Booth	0.09	0.84	0.09
B7P5M2	Manual Glaze Booth	0.09	0.84	0.09
B7P5A1	Double Automated Glaze Booth	0.52	4.78	0.48
B7P5A2	Automated Glaze Booth	3.90	2.39	3.63
B7P5A3	Automated Glaze Booth	3.90	2.39	3.63
B2P3T	Tank Casting Scraping	1.81	2.35	1.69
B3P3B	Bowl Casting Scraping	10.35	4.67	9.65
B4P3U	Urinal Casting Scraping	0.29	0.10	0.27
B4P3T	Tank Casting Scraping	2.25	2.91	2.10
B4P3L	Lavatory Casting Scraping	0.38	0.68	0.35
B4P3B	Bowl Casting Scraping	2.01	0.91	1.88
B7P4M1	Inspection Glaze Booth	1.07	4.66	1.00
B10AP4M1	Inspection Booth	1.07	4.66	1.00
B10DP4M1	Inspection/Recondition Booth	1.07	4.66	1.00
	Mold Making	1.07	0.19	1.00
B5C1	Silo Containment System	1.07	3.75	1.00
B5C3	Reclaim Crusher	1.07	0.75	1.00
B5C2	Blunger	1.07	8.25	1.00
	Glaze Mix-up	1.07	3.00	1.00

The requirements of 326 IAC 6-3-2 in conjunction with the material throughput limitation (50%) of plant capacity will also render 326 IAC 2-7 (Part 70 application) and 326 IAC 2-2 (PSD) not applicable.

**326 IAC 6-4 (Fugitive Dust Emissions)**

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4, fugitive particulate matter emissions shall not be visible crossing the property lines.

**326 IAC 8-1 through 8-7 (Volatile Organic Compound Rules)**

All materials used in the facilities covered under the proposed FESOP contain no VOC or HAPs, therefore no Article 8 rule is applicable to the facilities at the source.

**Compliance Requirements**

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

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

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

- a) The PM emitting equipment subject to 326 IAC 6-3-2, as listed in the previous section, have applicable compliance monitoring conditions as specified below:
  - (1) Daily visible emissions notations of the stack exhausts for the four (4) firing natural gas fired kilns, one (1) refire natural gas fired kiln, six (6) casting and scraping operations, and five (5) glaze spray booths shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

- (2) The Permittee shall record the total static pressure drop across the baghouses controlling the overspray from glaze spray booths B7P5M1, B7P5M2, and B7P5A1, at least once daily when the glaze spray booths are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses shall be maintained within the range of 1.0 to 3.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

- b) Raw material processed by the source shall be limited to 36,135 tons of clay per year.

These monitoring conditions are necessary because firing kilns, re-fire kiln, scraping operations, and control devices for all glaze spray booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) FESOP Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations (page 1 of Appendix A).

### **Conclusion**

The operation of this vitreous china plumbing fixtures manufacturing plant will be subject to the conditions of the attached proposed **FESOP No. F147-7890-00010**.

Table A

<b>Stack/Vent ID: B7S22</b>			
<b>Stack/Vent Dimensions:</b> Ht: 10' Dia: 4' x 6' Temp: Ambient Flow: 24,000 ACFM			
<b>Emission Unit: Glaze Spray Booths B7P5M1, B7P5M2, B7P5A1</b>			
<b>Date of Construction: 1993</b>			
<b>Alternative Scenario:</b>			
<b>Pollution Control Equipment: Baghouses</b>			
<b>General Description of Requirement:</b>	record scrubber static pressure drop and visibility observations		
<b>Numerical Emission Limit:</b>	PM (= PM10) Emissions: 0.09, 0.09 and 0.52 lb/hr, respectively		
<b>Regulation/Citation:</b>	326 IAC 6-3, 326 IAC 2-8-4		
<b>Compliance Demonstration:</b>	monitoring		
<b>PERFORMANCE TESTING N/A</b>			
<b>Parameter/Pollutant to be Tested:</b>			
<b>Testing Method/Analysis:</b>			
<b>Testing Frequency/Schedule:</b>			
<b>Submittal of Test Results:</b>			
<b>COMPLIANCE MONITORING</b>			
<b>Monitoring Description:</b>	maintain pressure drop within 1 and 3 inches and visibility observations		
<b>Monitoring Method:</b>	pressure gauges and by trained employee		
<b>Monitoring Regulation/Citation:</b>	326 IAC 6-3, 326 IAC 2-8-4		
<b>Monitoring Frequency:</b>	daily		
<b>RECORD KEEPING</b>			
<b>Parameter/Pollutant to be Recorded:</b>	pressure drop and visible emissions		
<b>Recording Frequency:</b>	daily		
<b>Submittal Schedule of Reports:</b>	upon OAM request		
<b>REPORTING REQUIREMENTS</b>			
<b>Information in Report:</b>	N/A		
<b>Reporting Frequency/Submittal:</b>	N/A		
<b>Additional Comments:</b>			

Table B

<b>Stack/Vent ID:</b>			
<b>Stack/Vent Dimensions:</b> Ht:                      Dia:                      Temp:                      Flow:			
<b>Emission Unit: All PM emissions facilities covered under the proposed FESOP</b>			
<b>Date of Construction: 1989</b>			
<b>Alternative Scenario:</b>			
<b>Pollution Control Equipment: Baghouses and Waterwash</b>			
<b>General Description of Requirement:</b>	visibility observations	raw material (clay) usage	
<b>Numerical Emission Limit:</b>	PM (= PM10) Emission rate as listed in page 6 of this TSD	36, 135 tons per year	
<b>Regulation/Citation:</b>	326 IAC 6-3, 326 IAC 2-8-4	326 IAC 2-8-4	
<b>Compliance Demonstration:</b>	monitoring	record keeping	
<b>PERFORMANCE TESTING</b> N/A			
<b>Parameter/Pollutant to be Tested:</b>			
<b>Testing Method/Analysis:</b>			
<b>Testing Frequency/Schedule:</b>			
<b>Submittal of Test Results:</b>			
<b>COMPLIANCE MONITORING</b>			
<b>Monitoring Description:</b>	visibility observations	N/A	
<b>Monitoring Method:</b>	by trained employee		
<b>Monitoring Regulation/Citation:</b>	326 IAC 6-3, 326 IAC 2-8-4		
<b>Monitoring Frequency:</b>	daily		
<b>RECORD KEEPING</b>			
<b>Parameter/Pollutant to be Recorded:</b>	visible emissions	raw material usage	
<b>Recording Frequency:</b>	daily	monthly	
<b>Submittal Schedule of Reports:</b>	upon OAM request	quarterly	
<b>REPORTING REQUIREMENTS</b>			
<b>Information in Report:</b>	N/A	raw material usage	
<b>Reporting Frequency/Submittal:</b>	N/A	quarterly	
<b>Additional Comments:</b>			

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

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

**Source Name:** Peerless Pottery, Inc.  
**Source Location:** North Lincoln Avenue, Rockport, Indiana 47635  
**SIC Code:** 3261  
**County:** Spencer  
**Operation Permit No.:** F147-7890-00010  
**Permit Reviewer:** Scott Pan/EVP

On October 16, 1997, the Office of Air Management (OAM) had a notice published in the Journal Democrat, Rockport, Indiana, stating that Peerless Pottery, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a fiberglass molding plant. The notice also stated that OAM proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the technical support document (TSD) and the proposed FESOP:

- (1) The kiln K-4 exhausts through stacks B10aS1 and B10aS2, not stacks B10bS1 and B10bS2 as indicated in the TSD and the proposed FESOP. The equipment lists in the TSD (page 1 of 10) and Sections A.2 (page 6 of 35) and D.1 (page 27 of 35) in the proposed FESOP have been revised to reflect that the kiln K-4 exhausts through stacks B10aS1 and B10aS2.
- (2) In the proposed FESOP, Condition D.1.8 incorrectly refers to documenting compliance with Condition D.1.4 for daily visible emission notations. Condition D.1.3 should have been referenced and Condition D.1.8 has been revised accordingly.

On October 30, 1997, Peerless Pottery, Inc. submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows:

**Comment #1:**

Peerless Pottery prefers to refer to the casting and scraping stations in Section A.2(e) - A.2(j) as the casting and scraping operations to further clarify each operation as an emission unit.

**Response #1:**

The equipment lists in the TSD (page 1 of 10) and Sections A.2 (page 5 of 35) and D.1 (page 27 of 35) in the proposed FESOP have been revised to reflect the change of casting and scraping station to casting and scraping operation.

**Comment #2:**

Section C.15(a) of the proposed FESOP (page 22 of 35) requires the Permittee to prepare a written Emergency Reduction Plan (ERP). Peerless Pottery has already submitted an ERP with the FESOP application on December 16, 1996. Please change Section C.15(a) to indicate the receipt of an ERP.

**Response #2:**

Condition C.15 has been revised as follows, to indicate that an ERP has been submitted:

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 16, 1996.
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

**Comment #3:**

Peerless Pottery requests that Condition D.1.7 be clarified to indicate that the clay usage limit is for the dry weight rate, by referring to the clay usage limit as 3,011 tons per month of the dry clay.

**Response #3:**

The clay usage limitation was calculated based on the dry clay usage. Therefore, Condition D.1.7 was revised, to indicate that the limitation is based on the dry clay usage rate, as follows:

D.1.7 Raw Material (Clay) Usage

Usage of clay, which is the main ingredient of the products at the source, shall not exceed 3,011 tons per month of dry clay. Compliance with Operation Conditions D.1.1, D.1.7 and D.2.1 shall also render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Program) not applicable.

**Comment #4:**

- (a) Condition D.1.4 (page 28 of 35) requires weekly readings of the total static pressure drop in the subject baghouses. Therefore, the record keeping frequency of the pressure drop in Condition D.1.8(b) (page 29 of 35) should also be weekly.
- (b) Condition D.1.8(b)(1)(B) (page 29 of 35) that requires record keeping of the cleaning cycle, which is not required by any other condition, should be omitted.
- (c) Conditions D.1.8(b) (2) through (7) contain conditions previously found in Condition C.20(c)(4) (page 25 of 35). Since Section C is incorporated by reference through Condition D.1.8(e), inclusion of these conditions is redundant and should be removed. If the conditions remain as Conditions D.1.8(b) (2) through (7), Peerless Pottery requests the language be changed to match Condition C.20(c)(4).

**Response #4:**

- (a) The record keeping frequency in Condition D.1.8(b) has been revised from daily to weekly to match the requirements of Condition D.1.4.
- (b) Provisions of Condition D.1.8(b)(1)(B) are for the cleaning of the pressure taps and are required to prevent premature pressure sensing instrument failure due to clogging. Therefore, the condition remains unchanged.
- (c) Conditions in Section C are for the entire source and Conditions in Section D are for specific equipment. Therefore, Conditions D.1.8(b) (2) through (7) are necessary and not redundant.

**Comment #5:**

In Table A of the TSD (page 9 of 10), the General Description of Requirement row incorrectly refer to the total scrubber static pressure drop. The word scrubber should be deleted.

**Response #5:**

Only baghouses, not scrubbers are used for PM emission control. Therefore, the word scrubber is removed from the General Description of Requirement row.

**Comment #6:**

The re-fire kiln, RK-1, is currently being disassembled and removed from the source. Therefore, Peerless Pottery requests this unit and the associated emissions be eliminated from the proposed FESOP.

**Response #6:**

In the following Sections or Condition, Item (d) (RK-1) has been removed the equipment list and the subsequent items have been re-numbered:

- (a) Section A.2 (page 5 of 35) of the proposed FESOP;
- (b) Section D.1 (page 27 of 35) of the proposed FESOP;

- (c) Condition D.1.1 of the proposed FESOP (page 18 of 35); and
- (d) Listing of Permitted Emission Units in the TSD (page 1 of 10).

Additionally, associated emissions from the re-fire kiln, RK-1, have been removed from the Limited Potential To Emit Table in the TSD, page 4 of 10, and the allowable emissions in the TSD, page 6 of 10.

**Appendix A: Emission Calculations  
Natural Gas Combustion  
MM Btu/hr 0.3 - < 10**

**Company Name: Peerless Pottery, Inc.  
Address City IN Zip: North Lincoln Avenue, Rockport, IN 47635  
CP: F147-7890  
Plt ID: 147-00010  
Reviewer: Scott Pan/EVP  
Date: July 16, 1997**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

2.5

21.9

Heat Input Capacity includes:  
one (1) 2.5 mmBtu/hr dryer

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.13	0.13	0.01	1.10	0.06	0.23

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

**Appendix A: Emissions Calculations**  
**Firing-Natural Gas Fired Kilns and Refire-Natural Gas Fired Kilns**

**Company Name:** Peerless Pottery, Inc.  
**Address City IN Zip:** North Lincoln Avenue, Rockport, IN 47635  
**FESOP #:** F147-7890  
**Plt ID:** 147-00010  
**Reviewer:** Scott Pan/EVP  
**Date:** July 16, 1997

**Raw Material Input Capacity**  
**tons of Ceramic/hr**

**Potential Throughput**  
**ton/yr**

4.660	<b>Firing Kiln</b>	40821.6
0.110	<b>Refire Kiln</b>	963.6

Raw Material Input Capacity includes:

Firing-Natural Gas Fired Kiln - two kilns @ 0.76 ton/hr; one kiln @ 0.55 ton/hr; one kiln @ 2.59 ton/hr

Reriring-Natural Gas Fired Kiln - one kiln @ 0.11 ton/hr

Emission Factor (lb/ton)	Pollutant	Emissions (ton/yr)						
		PM	PM10	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	HF
	Firing Kiln	0.49	0.49	0.44 S **	0.54	0.43	3.30	0.46
	Refire Kiln	0.067	0.067	0.00	0.00	0.00	0.00	0.019
Potential Emission in tons/yr	Firing Kiln	10.00	10.00	0.00	11.02	8.78	67.36	9.39
	Refire Kiln	0.03	0.03	0.00	0.00	0.00	0.00	0.01
	<b>TOTAL</b>	10.03	10.03	0.00	11.02	8.78	67.36	9.40
Limited Emission in tons/yr ***	Firing Kiln	5.00	5.00	0.00	5.51	4.39	33.68	4.69
	Refire Kiln	0.02	0.02	0.00	0.00	0.00	0.00	0.00
	<b>TOTAL</b>	5.02	5.02	0.00	5.51	4.39	33.68	4.70

\*\* S is the sulfur content of raw material. The source is using the raw material with no sulfur content, per MSDS.

The source is using lead-free material, therefore no lead is emitted.

Methodology:

Potential Throughput (ton/yr) = Raw Material Input Capacity (ton/hr) x 8,760 hrs/yr

Emission Factors are from AP 42, Chapter 11.7, Tables 11.7-1, 11.7-2 SCC #3-05-008-50

Potential Emission (tons/yr) = Throughput (ton/hr) x Emission Factor (lb/ton)/2,000 lb/ton x 8760 hr/yr

Limited Emission (tons/yr) = Potential Emissions (ton/yr) x usage limit (50%)

**Appendix A: Emissions Calculations  
Glaze Application**

**Company Name:** Peerless Pottery, Inc.  
**Address City IN Zip:** North Lincoln Avenue, Rockport, IN 47635  
**FESOP #:** F147-7890  
**Pit ID:** 147-00010  
**Reviewer:** Scott Pan/EVP  
**Date:** July 16, 1997

	Operation	Process Wt. (ton/hr)	Control Eff. (%)	Emissions (ton/yr)					
				PM	PM10	SO2	NOx	VOC	CO
Emissions Factor (lb/ton)				19.00	19.00	0.00	0.00	0.00	0.00
Potential Emissions (ton/yr)	Manual Spray Booth	0.225		18.72	18.72	0.00	0.00	0.00	0.00
	Manual Spray Booth	0.225		18.72	18.72	0.00	0.00	0.00	0.00
	Double Automated Booth	1.275		106.11	106.11	0.00	0.00	0.00	0.00
	Automated Spray Booth	0.6375		53.05	53.05	0.00	0.00	0.00	0.00
	Automated Spray Booth	0.6375		53.05	53.05	0.00	0.00	0.00	0.00
	<b>TOTAL</b>				249.66	249.66	0.00	0.00	0.00
Limited Emissions (ton/yr)	Manual Spray Booth	0.225	98%	0.19	0.19	0.00	0.00	0.00	0.00
	Manual Spray Booth	0.225	98%	0.19	0.19	0.00	0.00	0.00	0.00
	Double Automated Booth	1.275	98%	1.06	1.06	0.00	0.00	0.00	0.00
	Automated Spray Booth	0.6375	70%	7.96	7.96	0.00	0.00	0.00	0.00
	Automated Spray Booth	0.6375	70%	7.96	7.96	0.00	0.00	0.00	0.00
	<b>TOTAL</b>				17.35	17.35	0.00	0.00	0.00

- (a) The source is using glaze that contains no VOC or HAPs material, therefore no VOC or HAP is emitted.  
 (b) Controlled PM emissions from glazing operations were based on baghouse with 98% efficiency for two 450 lb/hr & one 2550 lb/hr booths and waterwash with 70% efficiency for the two 1275 lb/hr booths.

Methodology:

Potential Throughput (ton/yr) = Raw Material Input Capacity (ton/hr) x 8,760 hrs/yr

Emission Factors are from AP 42, Chapter 11.7, Tables 11.7-1, 11.7-2 SCC #3-05-008-50

Potential Emission (tons/yr) = Throughput (ton/hr) x Emission Factor (lb/ton)/2,000 lb/ton x 8760 hr/yr

Limited Emission (tons/yr) = Potential Emissions (ton/yr) x (1 - control efficiency) x usage limit (50%)

**Appendix A: Emissions Calculations  
Casting and Scraping Operations**

**Company Name: Peerless Pottery, Inc.**  
**Address City IN Zip: North Lincoln Avenue, Rockport, IN 47635**  
**FESOP #: F147-7890**  
**Plt ID: 147-00010**  
**Reviewer: Scott Pan/EVP**  
**Date: July 16, 1997**

Source ID	Source Description	Max. Process Rate (units/hr)	Emission Factor (1) (lb/unit)	Maximum Emmissions (2)		
				(lb/hr)	Potential (ton/yr)	Limited (ton/yr) (3)
B2P3T	Tank Casting Scraping	133	0.0127	1.69	7.40	3.70
B3P3B	Bowl Casting Scraping	288	0.0335	9.65	42.26	21.13
B4P3U	Urinal Casting Scraping	8	0.0335	0.27	1.17	0.59
B4P3T	Tank Casting Scraping	165	0.0127	2.10	9.18	4.59
B4P3L	Lavatory Casting Scraping	66.2	0.0053	0.35	1.54	0.77
B4P3B	Bowl Casting Scraping	56	0.0335	1.88	8.22	4.11
<b>Total</b>			0.13	15.93	69.76	34.88

- (1) Emission factors for each casting and scraping operation are based on information provided by the applicant.
- (2) Limited emissions are based on 50% of plant capacity, or  $8.25 \text{ ton/hr} * 8760 \text{ hr/yr} * 50\% = 36,135 \text{ ton/yr}$  processed for casting and scraping operations.

## Appendix A: Emission Calculations (Summary)

**Company Name:** Peerless Pottery, Inc.  
**Address City IN Zip:** North Lincoln Avenue, Rockport, IN 47635  
**FESOP #:** F147-7890  
**Plt ID:** 147-00010  
**Reviewer:** Scott Pan/EVP  
**Date:** July 16, 1997

Potential Emissions (tons/year)							
Emissions Generating Activity							
Pollutant	Firing Kiln	Refiring Kiln	Glaze Application	Casting and Scraping	Combustion	Miscellaneous Insig. Activities**	Total
PM	10.00	0.03	249.66	69.76	0.13	350.40	680.0
PM-10	10.00	0.03	249.66	69.76	0.13	350.40	680.0
SO <sub>2</sub>	0.00	0.00	0.00	0.00	0.01	0.00	0.0
NO <sub>x</sub>	11.02	0.00	0.00	0.00	1.10	0.00	12.1
VOC	8.78	0.00	0.00	0.00	0.06	0.00	8.8
CO	67.36	0.00	0.00	0.00	0.23	0.00	67.6
HF	9.39	0.01	0.00	0.00	0.00	0.00	9.4
Total emissions based on rated capacity at 8,760 hours/year.							
Controlled Emissions (tons/year)							
Emissions Generating Activity							
Pollutant	Firing Kiln	Refiring Kiln	Glaze Application	Casting and Scraping	Combustion	Miscellaneous Insig. Activities**	Total
PM	5.00	0.02	17.35	34.88	0.13	35.04	92.4
PM-10	5.00	0.02	17.35	34.88	0.13	35.04	92.4
SO <sub>2</sub>	0.00	0.00	0.00	0.00	0.00	0.00	0.0
NO <sub>x</sub>	5.51	0.00	0.00	0.00	0.00	0.00	5.5
VOC	4.39	0.00	0.00	0.00	0.00	0.00	4.4
CO	33.68	0.00	0.00	0.00	0.00	0.00	33.7
HF	4.69	0.00	0.00	0.00	0.00	0.00	4.7
Total emissions based on 50% of plant capacity, after control.							
** Miscellaneous insignificant activities include inspection and bowl glazing booth ID # B7P4M1, inspection booth ID # B10AP4M1, inspection and reconditioning booth ID # B10DP4M1, mold making activities, silo containment system, reclaim crusher, blunger, and glaze mix-up. Based on information provided by the applicant, each of these eight (8) activities has a controlled PM emission rate of less than 1 lb/hr. Therefore, the potential PM emissions from these activities are: $8 * 1 \text{ lb/hr} / (1 - 90\% \text{ control}) * 4.38 \text{ (ton/yr)} / (\text{lb/hr}) = 350.4 \text{ ton/yr}$ Controlled PM emissions = 350.4 ton/yr * (1 - 90%) = 35.04 ton/yr							