

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

**Vestil Manufacturing Corporation
2999 N. Wayne Street
Angola, Indiana 46703**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 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.: F151-8993-00035	
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)]

The Permittee owns and operates a stationary material handling products and loading dock equipment manufacturing plant.

Responsible Official: Ralph D. Trine
Source Address: 2999 N. Wayne Street, Angola, Indiana 46703
Mailing Address: P.O. Box 507, Angola, Indiana 46703
SIC Code: 3499
County Location: Steuben
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD Rules;
Minor Source, Section 112 of the Clean Air Act

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

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

- (1) Three (3) spray paint booths, identified as B2, B3 and B4, each with a maximum capacity of painting 2 steel yard ramps per hour, each utilizing an air assisted airless application system, with dry filters for control of overspray particulate matter, and each exhausting to one (1) stack, identified as V2, V3 and V4, respectively;
- (2) One (1) spray paint booth, identified as B1, with a maximum capacity of painting 10 metal curbs per hour, utilizing a high volume low pressure (HVLP) application system, with dry filters for control of overspray particulate matter, and exhausting to one (1) stack, identified as V1;
- (3) Fifty-one (51) steel MIG welding stations, each with a maximum wire consumption of 3.5 pounds per hour, utilizing a carbon steel E70S-6 electrode, and exhausting to general ventilation;
- (4) Six (6) aluminum MIG welding stations, each with a maximum wire consumption of 2.0 pounds per hour, utilizing an aluminum ER5356 electrode, and exhausting to general ventilation;
- (5) Forty-one (41) oxyacetylene flame-cutting, each with a maximum cut rate of 11.7 inches per minute for steel $\frac{3}{4}$ " thick, and exhausting to general ventilation;
- (6) One (1) radial cross cut woodsaw, identified as FS1, with a maximum throughput of 60 pounds of wood per hour, with particulate matter emissions controlled by one (1) small baghouse, and exhausting to general ventilation;
- (7) One (1) radial arm 14" woodsaw, identified as FS2, with a maximum throughput of 60 pounds of wood per hour, with particulate matter emissions controlled by one (1) cyclone and baghouse system, and exhausting to general ventilation; and
- (8) One (1) routing woodsaw, identified as FS3, with a maximum throughput of 60 pounds of wood per hour, with particulate matter emissions controlled by one (1) cyclone and

baghouse system, and exhausting to general ventilation.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [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(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:
 - (a) Nine (9) natural gas-fired furnaces, identified as T2 through T8, and T14 through T16, each with a maximum heat input capacity of 0.4 MMBtu/hr, and each exhausting through one (1) stack, identified as S2 through S8, and S14 through S16, respectively;
 - (b) Five (5) natural gas-fired furnaces, identified as C9 through C13, each with a maximum heat input capacity of 0.154 MMBtu/hr, and each exhausting through one (1) stack, identified as S9 through S13, respectively;
 - (c) One (1) natural gas-fired water heater, identified as W1, with a maximum heat input capacity of 0.034 MMBtu/hr, and exhausting through one (1) stack, identified as WH1; and
 - (d) One (1) natural gas-fired water heater, identified as W2, with a maximum heat input capacity of 0.44 MMBtu/hr, and exhausting through one (1) stack, identified as WH2.
- (2) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour as follows:
 - (a) Four propane-fired fork lift trucks, identified as FT1 through FT4, with a total capacity of 56,000 Btu/hr, and exhausting to general ventilation;
- (3) Cleaners and solvents, the use of which combined does not exceed 145 gallons per 12 months, characterized as: 1) having a vapor pressure equal to or less than 2 kPa, 15 mmHg, or 0.3 psi measured at 38 degrees C (100EF); or 2) having a vapor pressure equal to or less than 0.7 kPa, 5 mmHg, or 0.1 psi measured at 20 degrees C (68EF);
- (4) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;
- (5) Two (2) glue application stations, with a combined maximum capacity of 0.359 units per hour, each utilizing a spray gun application method, and exhausting to general ventilation; and
- (6) One (1) metal working shop, consisting of miscellaneous drills and cutting equipment, exhausting to general ventilation.

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]

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

SECTION B GENERAL CONDITIONS

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

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

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

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)]

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

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

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

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

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

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

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

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

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

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

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

- (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 to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

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

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

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

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

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

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than 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) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the

shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was 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.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, 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(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an

emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(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 response steps or preventive measures taken shall be reported to:

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

within ten (10) calendar days from the date of the discovery of the deviation.
- (b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM 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)]

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

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it

is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, 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]

- (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)]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F), except as provided by 326 IAC 2-8-11(c).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM, 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, review by affected states and review by U.S. EPA, as they apply to permit issuance and renewal.

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

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

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

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

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

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

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

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

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

and

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 Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

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

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

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997,

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

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

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 by an administrative amendment pursuant to 326 IAC 2-8-10.
- (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, within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

B.28 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and such facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(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. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

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

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]

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

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

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

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

(a) The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), for 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) Any change in an applicable stack shall require prior approval from IDEM, OAM.

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

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 be accredited is federally enforceable.

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

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

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

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

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

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

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

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)]

Compliance with applicable requirements shall be documented as required by this permit. The

Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify: Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

C.11 Monitoring Methods [326 IAC 3]

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

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

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

All required notifications shall be submitted to:

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

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

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

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

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

- (a) **Submit:**
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, 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.14 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;

- (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM, . The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

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

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of

the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

C.16 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM 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.17 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]

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

- (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or

before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

- (1) Three (3) spray paint booths, identified as B2, B3 and B4, each with a maximum capacity of painting 2 steel yard ramps per hour, each utilizing an air assisted airless application system, with dry filters for control of overspray particulate matter, and each exhausting to one (1) stack, identified as V2, V3 and V4, respectively;
- (2) One (1) spray paint booth, identified as B1, with a maximum capacity of painting 10 metal curbs per hour, utilizing a high volume low pressure (HVLP) application system, with dry filters for control of overspray particulate matter, and exhausting to one (1) stack, identified as V1; and
- (3) Two (2) glue application stations, with a combined maximum capacity of 0.359 units per hour, each utilizing a spray gun application method, and exhausting to general ventilation.

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

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to metal material handling products and loading dock equipment in the four (4) spray booths (B1, B2, B3, and B4) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for air dried coatings.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), these facilities shall use no more than 98.8 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per 365 consecutive day period. This usage limit is required to limit the potential to emit of VOC from the source to less than 99 tons per 365 consecutive day period. Compliance with this limit makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.3 Hazardous Air Pollutants (HAP) [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), these facilities shall use no more than 9.4 tons of any single HAP and 23.5 tons of a combination of HAPs, including coatings, dilution solvents, and cleaning solvents, per 365 consecutive day period. This usage limit is required to limit the potential to emit of HAPs from the source to less than 9.4 tons of any single HAP and 24 tons of a combination of HAPs tons per 365 consecutive day period. Compliance with this limit makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to CP-151-4483-00035, issued on August 1, 1995, the PM from the four (4) paint booths (B1, B2, B3, and B4) and two (2) glue application stations shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

D.1.5 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 Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-1-4(f), 326 IAC 2-8-4 and 326 IAC 2-8-5.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.8 Particulate Matter (PM)

Pursuant to CP-151-4483-00035, issued on August 1, 1995, the dry filters for PM control shall be in operation at all times when the four (4) paint booths (B1, B2, B3 and B4) are in operation.

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC emission limits and the VOC and HAP usage limits established in Conditions D.1.1, D.1.2 and D.1.3.

- (1) The amount, VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day;
 - (4) The cleanup solvent usage for each day;
 - (5) The total VOC and HAP usage for each day; and
 - (6) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.8 and D.1.9, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2, and D.1.3 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

- (1) One (1) radial cross cut woodsaw, identified as FS1, with a maximum throughput of 60 pounds of wood per hour, with particulate matter emissions controlled by one (1) small baghouse, and exhausting to general ventilation;
- (2) One (1) radial arm 14" woodsaw, identified as FS2, with a maximum throughput of 60 pounds of wood per hour, with particulate matter emissions controlled by one (1) cyclone and baghouse system, and exhausting to general ventilation; and
- (3) One (1) routing woodsaw, identified as FS3, with a maximum throughput of 60 pounds of wood per hour, with particulate matter emissions controlled by one (1) cyclone and baghouse system, and exhausting to general ventilation.

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

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

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from FS1 shall not exceed 0.39 pounds per hour when operating at a process weight rate of 60 pounds per hour.
- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from FS2 and FS3 shall not exceed 0.78 pounds per hour when each line is operating at a process weight rate of 60 pounds per hour.
- (c) The pounds per hour limitation was calculated with the following equation:

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

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

Compliance Determination Requirements

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

Testing of this facility is not required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-1-4(f), 326 IAC 2-8-4 and 326 IAC 2-8-5.

SECTION D.3 FACILITY OPERATION CONDITIONS

- (1) Fifty-one (51) steel MIG welding stations, each with a maximum wire consumption of 3.5 pounds per hour, utilizing a carbon steel E70S-6 electrode, and exhausting to general ventilation;
- (2) Six (6) aluminum MIG welding stations, each with a maximum wire consumption of 2.0 pounds per hour, utilizing an aluminum ER5356 electrode, and exhausting to general ventilation;
- (3) Forty-one (41) oxyacetylene flame-cutting, each with a maximum cut rate of 11.7 inches per minute for steel 3/4" thick, and exhausting to general ventilation;

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

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

Pursuant to CP-151-4483-00035, issued on August 1, 1995, the PM from the welding and flamecutting equipment shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-1-4(f), 326 IAC 2-8-4 and 326 IAC 2-8-5.

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

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

Source Name: Vestil Manufacturing Corporation
Source Address: 2999 North Wayne Street, Angola, Indiana 46703
Mailing Address: P.O. Box 507, Angola, Indiana 46703
FESOP No.: F151-8993-00035

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

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Emergency/Deviation Occurrence Reporting Form
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

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

Source Name: Vestil Manufacturing Corporation
Source Address: 2999 North Wayne Street, Angola, Indiana 46703
Mailing Address: P.O. Box 507, Angola, Indiana 46703
FESOP No.: F151-8993-00035

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) CThe Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) CThe Permittee must submit notice in writing within ten (10) calendar days

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

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

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

Page 2 of 2

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Vestil Manufacturing Corporation
 Source Address: 2999 North Wayne Street, Angola, Indiana 46703
 Mailing Address: P.O. Box 507, Angola, Indiana 46703
 FESOP No.: F151-8993-00035
 Facility: Spray Booths B1, B2, B3 and B4, and Glue Application Stations
 Parameter: VOC and HAPs
 Limit: 98.8 tons of VOC per 365 consecutive day period;

Month: _____ Year: _____

Day	VOC Usage This Day (tons)	VOC Usage Previous 364 Days (tons)	VOC Usage for 365 day period (tons)	Day	VOC Usage This Day (tons)	VOC Usage Previous 364 Days (tons)	VOC Usage for 365 day period (tons)
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				no. of deviation s			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

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

Vestil Manufacturing Corporation
Angola, Indiana
Permit Reviewer: Bryan Sheets

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OP No. F151-8993-00035

Phone:

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

FESOP Quarterly Report

Source Name: Vestil Manufacturing Corporation
 Source Address: 2999 North Wayne Street, Angola, Indiana 46703
 Mailing Address: P.O. Box 507, Angola, Indiana 46703
 FESOP No.: F151-8993-00035
 Facility: Spray Booths B1, B2, B3 and B4, and Glue Application Stations
 Parameter: VOC and HAPs
 Limit: 9.4 tons of any single HAP per 365 consecutive day period; and

Month: _____ Year: _____

Day	Daily HAP Usage (tons)		365 day HAP Usage (tons)		Day	Daily HAP Usage (tons)		365 day HAP Usage (tons)	
	(HAP)		(HAP)			(HAP)		(HAP)	
1					17				
2					18				
3					19				
4					20				
5					21				
6					22				
7					23				
8					24				
9					25				
10					26				
11					27				
12					28				
13					29				
14					30				
15					31				
16					no. of deviations				

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

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

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

FESOP Quarterly Report

Source Name: Vestil Manufacturing Corporation
 Source Address: 2999 North Wayne Street, Angola, Indiana 46703
 Mailing Address: P.O. Box 507, Angola, Indiana 46703
 FESOP No.: F151-8993-00035
 Facility: Spray Booths B1, B2, B3 and B4, and Glue Application Stations
 Parameter: VOC and HAPs
 Limit: 23.5 tons of a combination of HAPs per 365 consecutive day period.

Month: _____ Year: _____

Day	Daily Combination of HAPs Usage (tons)	Combination of HAPs Usage 365 Day Period (tons)	Day	Daily Combination of HAPs Usage (tons)	Combination of HAPs Usage 365 Day Period (tons)
1			17		
2			18		
3			19		
4			20		
5			21		
6			22		
7			23		
8			24		
9			25		
10			26		
11			27		
12			28		
13			29		
14			30		
15			31		
16			no. of deviations		

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

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

Vestil Manufacturing Corporation
Angola, Indiana
Permit Reviewer: Bryan Sheets

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OP No. F151-8993-00035

Phone:

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

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

Source Name: Vestil Manufacturing Corporation
 Source Address: 2999 North Wayne Street, Angola, Indiana 46703
 Mailing Address: P.O. Box 507, Angola, Indiana 46703
 FESOP No.: F151-8993-00035

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

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

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

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

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

Attach a signed certification to complete this report.

**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:	Vestil Manufacturing Corporation
Source Location:	2999 N. Wayne Street, Angola, Indiana 46703
County:	Steuben
SIC Code:	3499
Operation Permit No.:	F151-8993-00035
Permit Reviewer:	Bryan Sheets

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Vestil Manufacturing Corporation relating to the operation of a material handling products and loading dock equipment manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

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

- (1) Three (3) spray paint booths, identified as B2, B3 and B4, each with a maximum capacity of painting 2 steel yard ramps per hour, each utilizing an air assisted airless application system, with dry filters for control of overspray particulate matter, and each exhausting to one (1) stack, identified as V2, V3 and V4, respectively;
- (2) One (1) spray paint booth, identified as B1, with a maximum capacity of painting 10 metal curbs per hour, utilizing a high volume low pressure (HVLP) application system, with dry filters for control of overspray particulate matter, and exhausting to one (1) stack, identified as V1;
- (3) Thirty-six (36) steel MIG welding stations, each with a maximum wire consumption of 3.5 pounds per hour, utilizing a carbon steel E70S-6 electrode, and exhausting to general ventilation;
- (4) Six (6) aluminum MIG welding stations, each with a maximum wire consumption of 2.0 pounds per hour, utilizing an aluminum ER5356 electrode, and exhausting to general ventilation;
- (5) Thirteen (13) oxyacetylene flame-cutting, each with a maximum cut rate of 11.7 inches per minute for steel $\frac{3}{4}$ " thick, and exhausting to general ventilation;
- (6) One (1) radial cross cut woodsaw, identified as FS1, with a maximum throughput of 60 pounds of wood per hour, with particulate matter emissions controlled by one (1) small baghouse, and exhausting to general ventilation;
- (7) One (1) radial arm 14" woodsaw, identified as FS2, with a maximum throughput of 60 pounds of wood per hour, with particulate matter emissions controlled by one (1) cyclone and baghouse system, and exhausting to general ventilation; and

- (8) One (1) routing woodsaw, identified as FS3, with a maximum throughput of 60 pounds of wood per hour, with particulate matter emissions controlled by one (1) cyclone and baghouse system, and exhausting to general ventilation.

Unpermitted Emission Units and Pollution Control Equipment

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

- (1) Fifteen (15) steel MIG welding stations, each with a maximum wire consumption of 3.5 pounds per hour, utilizing a carbon steel E70S-6 electrode, and exhausting to general ventilation; and
- (2) Twenty-eight (28) oxyacetylene flame-cutting, each with a maximum cut rate of 11.7 inches per minute for steel $\frac{3}{4}$ " thick, and exhausting to general ventilation;

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

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

Insignificant Activities

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

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:
 - (a) Nine (9) natural gas-fired furnaces, identified as T2 through T8, and T14 through T16, each with a maximum heat input capacity of 0.4 MMBtu/hr, and each exhausting through one (1) stack, identified as S2 through S8, and S14 through S16, respectively;
 - (b) Five (5) natural gas-fired furnaces, identified as C9 through C13, each with a maximum heat input capacity of 0.154 MMBtu/hr, and each exhausting through one (1) stack, identified as S9 through S13, respectively;
 - (c) One (1) natural gas-fired water heater, identified as W1, with a maximum heat input capacity of 0.034 MMBtu/hr, and exhausting through one (1) stack, identified as WH1; and
 - (d) One (1) natural gas-fired water heater, identified as W2, with a maximum heat input capacity of 0.44 MMBtu/hr, and exhausting through one (1) stack, identified as WH2.
- (2) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour as follows:
 - (a) Four propane-fired fork lift trucks, identified as FT1 through FT4, with a total capacity of 56,000 Btu/hr, and exhausting to general ventilation;
- (3) Cleaners and solvents, the use of which combined does not exceed 145 gallons per 12

months, characterized as: 1) having a vapor pressure equal to or less than 2 kPa, 15 mmHg, or 0.3 psi measured at 38 degrees C (100EF); or 2) having a vapor pressure equal to or less than 0.7 kPa, 5 mmHg, or 0.1 psi measured at 20 degrees C (68EF);

- (4) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;
- (5) Two (2) glue application stations, with a combined maximum capacity of 0.359 units per hour, each utilizing a spray gun application method, and exhausting to general ventilation; and
- (6) One (1) metal working shop, consisting of miscellaneous drills and cutting equipment, exhausting to general ventilation.

Existing Approvals

This source has been operating under the following approvals:

- (1) CP-151-4483-00035, issued on August 1, 1995; and
- (2) CP-151-9200-00035, issued on December 8, 1997.

Enforcement Issue

IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:

- (1) Fifteen (15) steel MIG welding stations, each with a maximum wire consumption of 3.5 pounds per hour, utilizing a carbon steel E70S-6 electrode, and exhausting to general ventilation; and
- (2) Twenty-eight (28) oxyacetylene flame-cutting, each with a maximum cut rate of 11.7 inches per minute for steel $\frac{3}{4}$ " thick, and exhausting to general ventilation;

IDEM is reviewing this matter and will take appropriate action. This proposed permit will also satisfy the requirements of the construction permit rules.

Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on September 17, 1997. Additional information was received on December 19, 1997, December 28, 1997, and January 5, 1998.

Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations.

Potential Emissions

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

Pollutant	Potential Emissions (tons/year)
PM	151.21
PM-10	151.21
SO ₂	negligible
VOC	121.09
CO	0.8
NO _x	2.0

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

HAP	Potential Emissions (tons/year)
Dibutyl Phthalate	9.09
Glycol Ethers	80.47
Perchloroethylene	0.67
Dichloromethane	2.90
Toluene	0.45
Manganese Compounds	0.44
Nickel Compounds	0.01
Chromium Compounds	0.03
TOTAL	94.06

See attached spreadsheets for detailed calculations.

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

Limited Potential To Emit

- (a) The source has accepted a federally enforceable limit on potential to emit VOC of 99 tons per year, consisting of:
 - (i) 98.8 tons per year for the significant activities; and

- (ii) 0.2 tons per year for the insignificant activities.
- (b) The source has accepted a limit on potential to emit 9.4 tons per year for any single HAP and 24 tons per year for any combination of HAPs.

The permit contains provisions that allow the source to use daily records to document compliance with limitations that correspond to 99 tons of VOC per year and 9.4 tons of HAPs per year.

Process/Facility	Limited Potential to Emit (tons/year)						
	PM	PM	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating Booths and Glue Application	5.4	5.4	0	98.8	0	0	23.5
Welding and Flamecutting	23.0	23.0	0	0	0	0	0.5
Woodworking	5.1	5.1	0	0	0	0	0
Insignificant Activities (i.e. combustion sources)	0.2	0.2	0	0.2	0.8	2.0	0
Total Emissions	33.7	33.7	0	99	0.8	2.0	24

The PM emissions from the spray booths and woodworking are both limited by 326 IAC 6-3 (Process Operations) and the requirement to operate the control equipment to meet those limits. VOC and HAP emissions from the spray booths and glue application stations have been synthetically limited below the Title V thresholds and the requirement to keep records of usage will demonstrate compliance with these limits.

County Attainment Status

The source is located in Steuben County.

Pollutant	Status
TSP	Attainment or Unclassifiable
PM-10	Attainment or Unclassifiable
SO ₂	Attainment or Unclassifiable
NO ₂	Attainment or Unclassifiable
Ozone	Attainment or Unclassifiable
CO	Attainment or Unclassifiable
Lead	Attainment or Unclassifiable

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

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 not subject to 326 IAC 2-6 (Emission Reporting), because the potential to emit all criteria pollutants is less than one hundred (100) tons per year.

326 IAC 5-1 (Visible Emissions Limitations)

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

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

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to the requirements of 326 IAC 6-4 (Fugitive Dust Emissions) and shall meet the limitations of 326 IAC 6-4-2.

State Rule Applicability - Woodworking

326 IAC 6-3 (Particulate Emissions Limitations for Process Operations)

These facilities are subject to the requirements of 326 IAC 6-3 (Particulate Emissions Limitations for Process Operations), because they are located in an area designated as attainment for particulate matter and the operations are defined as process operations. 326 IAC 6-3-2(c) requires that the particulate matter (PM) each woodworking unit be limited to 0.39 pounds per hour while operating at a maximum process weight rate of 60 pounds per hour. These emission limits were determined using the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The emissions from units FS2 and FS3 are exhausted to a common cyclone/baghouse system. For purposes of determining compliance with the limits of 326 IAC 6-3-2, the limits for these units shall be combined.

The control equipment for the woodworking units shall be in operation at all times the associated facility is in operation, in order to comply with this limit.

State Rule Applicability - Spray Paint Booths and Glue Application

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

That pursuant to 326 IAC 2-8 (Federally Enforceable State Operating Permit), the emissions of one HAP shall be limited to 9.4 tons per year and the emissions of a combination of HAPs shall be limited to 23.5 tons per year. Compliance with this limit will ensure that the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.

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

That pursuant to 326 IAC 2-8-4 (Federally Enforceable State Operating Permit), the VOC emissions shall be limited to 98.8 tons per 365 consecutive day period. Compliance with this limit will ensure that the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied in the spray booths shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the company and calculations made, the paint booth is in compliance with this requirement.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the spray booths shall be limited by the following:

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

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

State Rule Applicability - Welding/Flamecutting Operations

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) overspray from the welding and flamecutting operations shall be limited by the following:

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

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

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) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

These monitoring conditions are necessary because the dry filters for the spray booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).

Air Toxic Emissions

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

This source has accepted federally enforceable air toxic emission limits of 9.4 tons per year for any single HAP and/or 24 tons per year for any combination of HAPs.

Conclusion

The operation of this material handling products and loading dock equipment manufacturing plant will be subject to the conditions of the attached proposed **FESOP No. F151-8993-00035**.

**Appendix A: Emission Calculations
Combustion Sources**

Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 North Wayne Street, Angola, IN 46703
Permit No. : T151-8993-00035
Plt ID: 151-00035
Reviewer: Bryan Sheets
Date: 11/25/97

A. Natural Gas Combustion < 0.3 MMBtu/hr

Heat Input Capacity Potential Throughput
MMBtu/hr MMCF/yr

4.8

42.1

Emission Factor in lb/MMCF	PM 11.2	PM10 11.2	SO2 0.6	NOx 94.0	VOC 7.3	CO 40.0
Potential Emission in tons/yr	0.2	0.2	0.0	2.0	0.2	0.8

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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, No SCC

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

B. Propane Combustion < 0.3 MMBtu/hr

220 horsepower x 254.25 Btu/hr/horsepower = 56,000 Btu/hr

Heat Input Capacity
MMBtu/hr

Potential Throughput
kgals/year

SO2 Emission factor = 0.10 x S
S = Weight % Sulfur =

0.01

0.06

5.22

	Pollutant					
Emission Factor in lb/kgal	PM 0.4	PM10 0.4	SO2 0.0 (0.10S)	NOx 14.0	VOC 0.3	CO 1.9
Potential Emission in tons/yr	0.00	0.00	0.00	0.04	0.00	0.00

Methodology

1 gallon of LPG has a heating value of 94,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.094 MME

Emission Factors are from AP42, Fifth Edition (January 1995), Table 1.5-2 (SCC #1-02-010-02)

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

HAP Emission Calculations

Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 North Wayne Street, Angola, IN 46703
Part 70 Permit No.: T151-8993-00035
Plt ID: 151-00035
Reviewer: Bryan Sheets
Date: 11/25/97

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Dibutyl Phthalate	Weight % Glycol Ethers	Weight % Perchloroethylene	Weight % Dichloromethane	Weight % Toluene	Dibutyl Phthalate Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Perchloroethylene Emissions (ton/yr)	Dichloromethane Emissions (ton/yr)	Toluene Emissions (ton/yr)	Total HAP Emissions (ton/yr)
Booth B1														
Yellow Gloss	9.1	0.20	10.00	0.83%	7.30%	0.00%	0.00%	0.00%	0.66	5.80	0.00	0.00	0.00	6.46
Booth B2														
Yellow Gloss	9.1	4.00	2.00	0.83%	7.30%	0.00%	0.00%	0.00%	2.64	23.20	0.00	0.00	0.00	25.84
Blue Gloss	9.0	4.00	2.00	0.89%	7.91%	0.00%	0.00%	0.00%	2.80	24.89	0.00	0.00	0.00	27.69
Brown Gloss	9.1	4.00	2.00	0.88%	7.54%	0.00%	0.00%	0.00%	2.81	24.10	0.00	0.00	0.00	26.91
Booth B3														
Yellow Gloss	9.1	4.00	2.00	0.83%	7.30%	0.00%	0.00%	0.00%	2.64	23.20	0.00	0.00	0.00	25.84
Blue Gloss	9.0	4.00	2.00	0.89%	7.91%	0.00%	0.00%	0.00%	2.80	24.89	0.00	0.00	0.00	27.69
Brown Gloss	9.1	4.00	2.00	0.88%	7.54%	0.00%	0.00%	0.00%	2.81	24.10	0.00	0.00	0.00	26.91
Booth B4														
Yellow Gloss	9.1	4.00	2.00	0.83%	7.30%	0.00%	0.00%	0.00%	2.64	23.20	0.00	0.00	0.00	25.84
Blue Gloss	9.0	4.00	2.00	0.89%	7.91%	0.00%	0.00%	0.00%	2.80	24.89	0.00	0.00	0.00	27.69
Brown Gloss	9.1	4.00	2.00	0.88%	7.54%	0.00%	0.00%	0.00%	2.81	24.10	0.00	0.00	0.00	26.91
Glue Application														
Flexible Foam Adhesive	10.0	0.28	0.36	0.00%	0.00%	15.00%	65.00%	10.00%	0.00	0.00	0.67	2.90	0.45	4.01

Total State Potential Emissions **9.10 80.47 0.67 2.90 0.45 93.54**

METHODOLOGY

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

**Appendix A: Emissions Calculations
Welding/Flamecutting**

Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 North Wayne Street, Angola, IN 46703
Permit No. : T151-8993-00035
Plt ID: 151-00035
Reviewer: Bryan Sheets
Date: 11/25/97

A. Potential Emissions

Number of MIG Steel Welding Stations: 51
Maximum Hourly Consumption of Wire per Station: 3.5 pounds
Emission Factor for PM/PM10 Emissions: 0.0055 pounds per pound wire
Emission Factor for Manganese Emissions: 0.0005 pounds per pound wire
Total Maximum Wire Usage per Year: 1563660 pounds

$$\begin{aligned} \text{Potential PM/PM10 Emissions} &= 1563660 \text{ lbs wire/yr} \times 0.0055 \text{ lbs PM/lb wire} \times 1 \text{ ton/2000 lbs} \\ &= 4.30 \text{ tons/yr} \end{aligned}$$

$$\begin{aligned} \text{Potential Manganese Emissions} &= 1563660 \text{ lbs wire/yr} \times 0.0005 \text{ lbs PM/lb wire} \times 1 \text{ ton/2000 lbs} \\ &= 0.39 \text{ tons/yr} \end{aligned}$$

Number of MIG Aluminum Welding Stations: 6
Maximum Hourly Consumption of Wire per Station: 2.0 pounds
Emission Factor for PM/PM10 Emissions: 0.0723 pounds per pound wire
Total Maximum Wire Usage per Year: 105120 pounds

$$\begin{aligned} \text{Potential PM/PM10 Emissions} &= 105120 \text{ lbs wire/yr} \times 0.0723 \text{ lbs PM/lb wire} \times 1 \text{ ton/2000 lbs} \\ &= 3.80 \text{ tons/yr} \end{aligned}$$

Number of Oxyacetylene Cutting Stations: 41
Maximum Hourly Cutting Rate: 11.7 inches per minute
Maximum Cutting Thickness: 0.75 inches
Emission Factor for PM/PM10 Emissions: 0.1622 pounds per pound wire
Emission Factor for Manganese Emissions: 0.0005 pounds per pound wire
Emission Factor for Nickel Emissions: 0.0001 pounds per pound wire
Emission Factor for Chromium Emissions: 0.0003 pounds per pound wire
Total Maximum Amount Cut per Year: 189097.74 kiloinches

$$\begin{aligned} \text{Potential PM/PM10 Emissions} &= 189097.74 \text{ kin/yr} \times 0.1622 \text{ lbs PM/lb wire} \times 1 \text{ ton/2000 lbs} \\ &= 15.34 \text{ tons/yr} \end{aligned}$$

$$\begin{aligned} \text{Potential Manganese Emissions} &= 189097.74 \text{ kin/yr} \times 0.0005 \text{ lbs PM/lb wire} \times 1 \text{ ton/2000 lbs} \\ &= 0.05 \text{ tons/yr} \end{aligned}$$

$$\begin{aligned} \text{Potential Nickel Emissions} &= 189097.74 \text{ kin/yr} \times 0.0001 \text{ lbs PM/lb wire} \times 1 \text{ ton/2000 lbs} \\ &= 0.01 \text{ tons/yr} \end{aligned}$$

$$\begin{aligned} \text{Potential Chromium Emissions} &= 189097.74 \text{ kin/yr} \times 0.0003 \text{ lbs PM/lb wire} \times 1 \text{ ton/2000 lbs} \\ &= 0.03 \text{ tons/yr} \end{aligned}$$

**Appendix A: Emissions Calculations
Woodworking**

Company Name: Vestil Manufacturing Corporation
Address City IN Zip: 2999 North Wayne Street, Angola, IN 46703
Part 70 Permit No.: T151-8993-00035
Plt ID: 151-00035
Reviewer: Bryan Sheets
Date: 11/25/97

A. Potential Emissions

Amount of sawdust collected from FS1 (lbs/hr): 1.8

Efficiency of cyclones and baghouse: 99%

Potential emissions before controls:

$$\frac{\text{PM collected (lbs/hr)} \times 8760 \text{ hrs/yr}}{\text{Efficiency (\%)} \times 2000 \text{ lbs/ton}}$$
$$\frac{1.8 \text{ lbs/hr} \times 8760 \text{ hrs/yr}}{0.99 \times 2000 \text{ lbs/ton}} = 7.96 \text{ tons/yr}$$

Potential emissions after controls:

$$\text{Potential emissions before controls} \times (1 - \text{efficiency})$$

$$7.96 \text{ tons/yr} \times (1 - 0.99) = 0.08 \text{ tons/yr}$$

Potential emissions from units FS2 and FS3 are the same as unit FS1.

B. Allowable Emissions

Pursuant to 326 IAC 6-3-2, the PM emissions from unit FS1 shall not exceed an amount determined by the following equation:

$$E = 4.10 (P)^{0.67} \quad \text{where } E = \text{allowable PM emissions (lbs/hr)}$$
$$P = \text{process weight rate (tons/hr)}$$

$$E = 4.10 (0.03)^{0.67}$$

$$= 0.39 \text{ lbs/hr}$$

$$= 1.71 \text{ tons/yr}$$

The allowable emissions for units FS2 and FS3 are the same as unit FS1.

Since potential emissions after controls are less than the allowable limit, this equipment can comply with 326 IAC 6-3-2.

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

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

**Vestil Manufacturing Corporation
2999 N. Wayne Street
Angola, Indiana 46703**

F-151-8993, Plt ID-151-00035

On February 7, 1998, the Office of Air Management (OAM) had a notice published in the Herald Republican, Angola, Indiana, stating that Vestil Manufacturing Corporation had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a material handling and loading dock equipment manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On March 13, 1998, Vestil Manufacturing Corporation submitted a comment on the proposed FESOP. The summary of the comment is as follows:

COMMENT:

On page 3 of 8 in the Technical Support Document (TSD), it states under the heading Enforcement Issue that there were welding stations and torches constructed without a permit. These welding stations and the oxyacetylene flame cutting torches cannot be operated at the same time. It is physically impossible because each welding station is managed by one worker and each is supplied with a torch for the infrequent case where it may be necessary for the worker to cut a component of the product to fit so he can weld it.

RESPONSE:

Although the flame cutting torches and welding equipment cannot be operated at the same time, potential PM emissions from just operating the 28 unpermitted oxyacetylene flame cutting torches is still greater than the threshold for registered emission units. Therefore, the IDEM will review the enforcement issue and take appropriate action.