

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Bruco Industries, Inc.
4630 Allen Martin Drive
Fort Wayne, Indiana 46806**

(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.

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|---|----------------|
| Operation Permit No.: F 003-9420-00289 | |
| Issued by: Paul Dubenetzky, Branch Chief Office of Air Management | Issuance Date: |

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary metal job shop source, that coats and fabricates metal tanks and containers.

Responsible Official: Bruce Berlien
Source Address: 4630 Allen Martin Drive, Fort Wayne, IN 46806
Mailing Address: 4630 Allen Martin Drive, Fort Wayne, IN 46806
SIC Code: 3499
County Location: Allen
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:

One (1) spray coating booth, known as EU-01, constructed in January 1993, equipped with high volume low pressure (HVLP) spray guns and dry filters for particulate matter control, exhausting to Stack 01, capacity: 1.25 metal containers per hour.

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):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour.
- (b) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) Any of the following structural steel and bridge fabrication activities: Cutting 200,000 linear feet or less of one (1) inch plate or equivalent, using eighty (80) tons or less of welding consumables.
- (e) Paved and unpaved roads and parking lots with public access.

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

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

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. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance 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, 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 based on continuous or intermittent data;
 - (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 facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP'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) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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

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

B.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) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, 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 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

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

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 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.20 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.21 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.22 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.23 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)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.24 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. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM shall reserve the right to issue a new permit.

B.25 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. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.26 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 twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month 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 twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not 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 and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

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

The Permittee shall comply with the applicable 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.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

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

- (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

C.9 Performance Testing [326 IAC 3-6]

-
- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by 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 prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

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

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

Compliance Monitoring Requirements [326 IAC 2-8-4] [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 may extend compliance schedule an additional ninety (90) days provided the Permittee 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, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

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

C.11 Monitoring Methods [326 IAC 3]

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

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

C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

- (1) This condition;
- (2) The Compliance Determination Requirements in Section D of this permit;

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

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

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

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

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

C.14 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.15 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

Stratospheric Ozone Protection

C.17 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

One (1) spray coating booth, known as EU-01, constructed in January 1993, equipped with high volume low pressure (HVLP) spray guns and dry filters for particulate matter control, exhausting to Stack 01, capacity: 1.25 metal containers per hour.

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

D.1.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-7]

The hazardous air pollutant emissions shall be limited as follows:

- (a) The amount of any single hazardous air pollutant (HAP) delivered to the applicators shall not exceed 9.9 tons per consecutive twelve month period.
- (b) During the first twelve (12) months of operation, the amount of any single hazardous air pollutant (HAP) delivered to the applicators shall be limited such that the total usage divided by the accumulated months of operation shall not exceed 9.9 total tons per year divided by twelve (12) months, which equals 0.825 tons per month, rolled on a monthly basis.
- (c) The amount of any combination of HAPs delivered to the applicators shall not exceed 24.0 tons per consecutive twelve month period.
- (d) During the first twelve (12) months of operation, the amount of any combination of HAPs delivered to the applicators shall be limited such that the total usage divided by the accumulated months of operation shall not exceed 24.0 total tons per year divided by twelve (12) months, which equals 2.0 tons per month, rolled on a monthly basis.

Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the one (1) spray coating booth (EU-01) shall not exceed 0.551 pounds per hour (2.41 tons per year) when operating at a process weight rate of 100 pounds per hour.

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

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

D.1.3 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 the metal tanks and containers fabricated from the cutting, welding and forming operations 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 extreme performance 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.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.5 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the one (1) spray coating booth (EU-01) is in operation.

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) 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.

D.1.8 HAPs Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total HAPs usage for the most recent twelve (12) month period.

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

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 from the surface coating booth stack 01 while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 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 monthly and shall be complete and sufficient to establish compliance with the HAP emission limits established in Condition D.1.1 and the VOC content limit established in Condition D.1.3.
 - (1) The amount and 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 and HAP content of the coatings, if this method is used to comply with D.1.3, for each day;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC and HAP usage for each month; and
 - (6) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventative 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 the HAP limit in Condition D.1.1 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

Insignificant Activities:

The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

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

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment shall not exceed allowable PM emission rate based on the following equation:

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

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

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

Compliance Determination Requirement

D.2.2 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

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

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

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

Source Name: Bruco Industries, Inc.
Source Address: 4630 Allen Martin Drive, Fort Wayne, IN 46806
Mailing Address: 4630 Allen Martin Drive, Fort Wayne, IN 46806
FESOP No.: F 003-9420-00289

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

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Bruco Industries, Inc.
Source Address: 4630 Allen Martin Drive, Fort Wayne, IN 46806
Mailing Address: 4630 Allen Martin Drive, Fort Wayne, IN 46806
FESOP No.: F 003-9420-00289

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: _____

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

FESOP Quarterly Report

Source Name: Bruco Industries, Inc.
Source Address: 4630 Allen Martin Drive, Fort Wayne, IN 46806
Mailing Address: 4630 Allen Martin Drive, Fort Wayne, IN 46806
FESOP No.: F 003-9420-00289
Facility: One (1) spray coating booth (EU-01)
Parameter: HAPs
Limit: 9.4 tons per year individual HAP / 24.0 tons per year combined HAPs

YEAR: _____

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

- 9 No deviation occurred in this 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**

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

Source Name: Bruco Industries, Inc.
Source Address: 4630 Allen Martin Drive, Fort Wayne, IN 46806
Mailing Address: 4630 Allen Martin Drive, Fort Wayne, IN 46806
FESOP No.: F 003-9420-00289

Months: _____ to _____ Year: _____

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

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

| Compliance Monitoring Requirement (eg. Permit Condition D.1.3) | Number of Deviations | Date of each Deviation |
|---|----------------------|------------------------|
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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 an Enhanced New Source Review
and
Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name: Bruco Industries, Inc.
Source Location: 4630 Allen Martin Drive, Fort Wayne, IN 46806
County: Allen
SIC Code: 3499
Operation Permit No.: F 003-9420-00289
Permit Reviewer: Peter E. Fontaine

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) permit application from Bruco Industries, Inc. relating to the operation of a metal job shop source.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

The source consists of the following unpermitted facilities/units:

- (a) One (1) epoxy spray coating booth, known as EU-01, constructed in January 1993, equipped with high volume low pressure (HVLP) spray guns and dry filters for particulate matter control, exhausting to Stack 01, capacity: 1.25 metal containers per hour.
- (b) Cutting, forming and welding operations, known as EU-02, constructed in January 1993, consisting of :
 - (1) Nine (9) metal inert gas welding stations, capacity: 3.5 pounds of wire per hour per welder.
 - (2) One (1) portable stick welding station, capacity: 1.0 electrode per hour.
 - (3) One (1) tungsten inert gas welding station, capacity: 1.0 pound of metal per hour.
 - (4) One (1) plasma cutting station, capacity: 12 inches of metal per minute, 0.75 inches thick.

New Emission Units and Pollution Control Equipment Requiring 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):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour.
- (b) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (d) Any of the following structural steel and bridge fabrication activities: Cutting 200,000 linear feet or less of one (1) inch plate or equivalent, using eighty (80) tons or less of welding consumables.
- (e) Paved and unpaved roads and parking lots with public access.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

There are no enforcement actions pending.

Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on January 28, 1998. Additional information was received on February 26, 1998 and March 5, 1998.

A notice of completeness letter was mailed to the source on April 3, 1998.

Emission Calculations

See pages 1 through 3 of 3 of Appendix A of this document for detailed emissions calculations.

Potential Emissions

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

| Pollutant | Potential Emissions (tons/year) |
|------------------|--|
| PM | 70.7 |
| PM ₁₀ | 70.7 |
| SO ₂ | 0.00 |
| VOC | 64.0 |
| CO | 0.00 |
| NO _x | 0.00 |

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

| HAP's | Potential Emissions (tons/year) |
|---------------|--|
| Xylene | greater than 10 |
| MIBK | greater than 10 |
| Ethyl benzene | less than 10 |
| Chromium | less than 10 |
| Cobalt | less than 10 |
| Manganese | less than 10 |
| Nickel | less than 10 |
| TOTAL | greater than 25 |

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) 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.
- (b) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

Actual Emissions

The following table shows the estimated emissions from the source. This information reflects the potential emissions adjusted to the actual hours of fabrication and painting operations of 2,400 and 1,200 hours per year, respectively.

| Pollutant | Actual Emissions (tons/year) |
|------------------|---|
| PM | 0.554 |
| PM ₁₀ | 0.554 |
| SO ₂ | 0.00 |
| VOC | 8.77 |
| CO | 0.00 |
| NO _x | 0.00 |
| Xylene | 4.51 |
| MIBK | 3.45 |
| Ethyl benzene | 0.618 |
| Chromium | 0.000301 |
| Cobalt | 0.0000323 |
| Manganese | 0.0199 |
| Nickel | 0.0000756 |

No previous emission data have been received from the source.

Limited Potential to Emit

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

| Process/facility | Limited Potential to Emit (tons/year) | | | | | | |
|------------------------------|--|--------------------|-----------------|-------------|--------------|-----------------|-------------|
| | PM | PM ₁₀ | SO ₂ | VOC | CO | NO _x | HAPs |
| Epoxy Spraying | 1.39 (2.41) | 1.39 (2.41) | 0.00 | 64.0 | 0.000 | 0.00 | 23.9 |
| Cutting, Forming and Welding | 1.33 (45.5) | 1.33 (45.5) | 0.00 | 0.000 | 0.000 | 0.00 | 0.074 |
| Insignificant Activities | 5.00 | 3.00 | 0.500 | 0.500 | 0.500 | 1.00 | 0.00 |
| Total Emissions | 7.72 (52.9) | 5.72 (50.9) | 0.500 | 64.5 | 0.500 | 1.00 | 24.0 |

The values in parentheses represent the allowable PM and equivalent PM₁₀ emissions pursuant to 326 IAC 6-3.

County Attainment Status

The source is located in Allen County.

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

Volatile organic compounds (VOC) and oxides of nitrogen (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. Allen County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12) and 40 CFR Part 60 applicable to this facility.
- (b) There are no NESHAP 40 CFR Part 63 applicable to these facilities.

State Rule Applicability - Entire Source

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

Since this new source has a potential emissions greater than 10 tons per year of any single HAP and 25 tons per year of any combination of HAPs, the requirements of 326 IAC 2-1-3.4 could apply. This source was constructed prior to June 27, 1997, therefore, 326 IAC 2-1-3.4 (New Source Toxics Control) will not apply. This source has also agreed to limit single HAP emissions to 9.4 tons and combined HAP emissions to 24.0 tons per consecutive twelve-(12-)month period. Therefore, 326 IAC 2-1-3.4 (New Source Toxics Control) will not apply.

326 IAC 2-6 (Emission Reporting)

This source located in Allen County is not subject to 326 IAC 2-6 (Emission Reporting), because it emits less than one hundred (100) tons per year of VOC and PM₁₀.

326 IAC 5-1 (Visible Emissions Limitations)

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

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

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

- (a) Epoxy Spraying

The particulate matter (PM) from the epoxy spray 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:

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

Since the process weight rate of 70 pounds per hour is less than 100 pounds per hour, a 100 pound per hour process weight rate is used in the equation. 326 IAC 6-3-2(c) limits the particulate matter to $E = 4.10 P^{0.67}$ or 0.551 pounds per hour (2.41 tons per year). Since this PM emission limit of 2.41 tons per year is greater than the controlled PM emission rate of 1.39 tons per year, the epoxy spray operations comply with this rule. The dry filters shall be in operation at all times the epoxy spray process is in operation, in order to comply with this limit.

- (b) Cutting, Forming and Welding

The particulate matter (PM) from the cutting, forming and welding 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:

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

326 IAC 6-3-2 Process Operations limit the particulate matter to $E = 4.10 P^{0.67}$ or 10.4 pounds per hour (45.5 tons per year) for a process weight of 4.00 tons per hour. Since this PM emission limit of 45.5 tons per year is greater than the potential PM emission rate of 1.33 tons per year, the cutting, forming, and welding operations comply with this rule.

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 delivered to the applicator at the epoxy spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance 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 source and calculations made, the spray booth is in compliance with this requirement.

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

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

1. The epoxy spray operations have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the exhaust from Stack 01 from the epoxy spray operations shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

- (b) The dry filters shall be operated with the epoxy spray operations at all times.

These monitoring conditions are necessary because the dry filters for the epoxy spray operations must operate properly to ensure compliance with 326 IAC 5-1 (Visible Emissions Limitations), and 326 IAC 6-3 (Process Operations).

- (c) The amount of VOC, any single HAP delivered to the applicators, and the amount of any combination of HAPs delivered to the applicators including cleanup solvents must be monitored and recorded on a monthly basis. The HAP information must be reported to OAM on a quarterly basis. Material Data Safety Sheets (MSDS) must be kept on file for each coating and cleanup solvent used during each quarter.

These monitoring conditions are necessary to ensure compliance with 326 IAC 8-2-9 (Surface Coating Emission Limitations: Miscellaneous Metal Coating Operations) and 326 IAC 2-8 (FESOP).

2. The cutting, forming and welding operations have applicable compliance monitoring conditions as specified below:

Daily visible emissions notations of the cutting, forming and welding operations shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

These monitoring conditions are necessary because the cutting, forming and welding operations must demonstrate compliance with the limits established in 326 IAC 5-1 (Visible Emissions Limitations).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See pages 2 through 3 of 3 of Appendix A for detailed air toxic calculations.
- (c) 326 IAC 2-1-3.4 (New Source Toxic Control) does not apply to this source because all emission units were constructed and operated prior to July 27, 1997.

Conclusion

The operation of this metal job shop source shall be subject to the conditions of the attached proposed FESOP No. F 003-9420-00289.

Indiana Department of Environmental Management Office of Air Management

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

Source Name: Bruco Industries, Inc.
 Source Location: 4630 Allen Martin Drive, Fort Wayne, IN 46806
 County: Allen
 FESOP: F 003-9420-00289
 SIC Code: 3499
 Permit Reviewer: Peter E. Fountaine

On July 30, 1998, the Office of Air Management (OAM) had a notice published in the Fort Wayne Journal Gazette, Fort Wayne, Indiana, stating that Bruco Industries, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a stationary metal job shop source with dry filters for particulate matter control. The notice also stated that OAM proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the FESOP. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

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)~~ **twelve (12)** consecutive ~~day~~ **month** period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per ~~three hundred sixty five (365)~~ **twelve (12)** consecutive ~~month day~~ **month** 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)~~ **twelve (12)** consecutive ~~month day~~ **month** period.

D.1.5 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the one (1) spray coating booth (EU-01) is in operation ~~and exhausting to the outside atmosphere.~~

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 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 monthly and shall be complete and sufficient to establish compliance with the HAP emission limits established in Condition D.1.1 and the VOC content limit established in Condition D.1.3.
- (1) The amount and 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 and HAP content of the coatings used for each month~~ **The volume weighted VOC and HAP content of the coatings, if this method is used to comply with D.1.3, for each day;**
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC and HAP usage for each month; and
 - (6) The weight of VOCs and HAPs emitted for each compliance period.

On August 20, 1998, Evelyn Crooks of Environmental Compliance Source, Ltd., submitted comments on behalf of Bruco Industries, Inc., on the proposed FESOP. The comments are as follows:

Comment 1:

A.2 - The spray coating booth should not be described as epoxy. As technology changes, new compliant coatings will become available. It is inaccurate to place this limitation in the emission unit description. Please remove it here and in all subsequent sections.

Response 1:

The description of the facility in Condition A.2 has been changed as follows, all references to the epoxy have been removed from the permit, the Table of Contents, and Section D.

- (a) One (1) ~~epoxy~~ spray coating booth, known as EU-01, constructed in January 1993, equipped with high volume low pressure (HVLP) spray guns and dry filters for particulate matter control, exhausting to Stack 01, capacity: 1.25 metal containers per hour.

Comment 2:

C.8 - The source does not have any RACM. Since this provision could not apply we request it be removed.

Response 2:

326 IAC 14-10 requires a thorough inspection of the affected facility or part of the facility by an Indiana accredited asbestos inspector. It is unlikely that a source would find it cost-effective to have an entire property thoroughly inspected for asbestos. Only schools with students in any grade from kindergarten through grade 12 are required to have a thorough inspection of the entire property. Thorough inspection includes analysis of any material that may contain asbestos. This could include cement walls, linoleum floor covering and counter tops, ceiling and wall panels, roofing, pipe wrap, and more. In addition, there would be no assurance that no asbestos-containing material has been added since the inspection. Many materials currently on the market are legally allowed to contain asbestos. Finally, asbestos-containing material that was determined at one time to be non-friable may deteriorate with time and become friable. The condition remains unchanged.

Comment 3:

C.12 - There are no regulated substances, subject to 40 CFR 68, at the source. We request this provision be removed as nonapplicable.

Response 3:

The condition has been deleted from the permit.

Comment 4:

C.13 - Bruco requests guidance information/minimum criteria for an acceptable Compliance Response Plan.

Response 4:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Comment 5:

C.14 - Stack testing is not required at this source. We request this provision be removed as non-applicable.

Response 5:

Presently, IDEM has not requested performance testing, but in the future, if IDEM desires to determine compliance with the particulate matter limit specified in Condition D.1.2, then performance tests can be requested and shall be conducted in accordance with Section C - Performance Testing. However, since performance testing may be required, the permit must address what happens if non-compliance is demonstrated. Although there is no stack testing required, the intent is for performance testing. Thus, the condition remains unchanged.

Comment 6:

C.18 - Bruco does not maintain, service, repair or dispose of appliances containing CFC or HCFC refrigerants. We request this provision be removed as non-applicable.

Response 6:

40 CFR 82 regulates the handling of ozone-depleting substances such as Freon in a variety of processes and products including domestic and commercial refrigeration and air-conditioning units and portable fire extinguishers. Most sources include one or more of these subject units. Maintenance or repair of such units has the potential to release substances controlled under these rules. Pursuant to 326 IAC 2-7-5, the permit must include all applicable requirements. Therefore, the condition remains unchanged.

Comment 7:

D.1.1 and D.1.8 - Bruco requests clarification regarding the twelve month period. When does it start? How is the limit compliance calculated during the initial 12 month period? Will the consecutive 12 month periods each begin on the anniversary of the initial period or will it change to a calendar year period at some later date?

Response 7:

The start date of the twelve month period is stated in Condition C.17 (g). When reporting is required, the first report should include the period from the date of issuance until the end of the calendar quarter in which the permit is issued. The quarterly reports correspond to calendar quarters. The anniversary date will not revert to a calendar year. In addition, the following language has been added for further clarification.

D.1.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-7]

The hazardous air pollutant emissions shall be limited as follows:

- (a) The amount of any single hazardous air pollutant (HAP) delivered to the applicators shall not exceed ~~9.4~~ **9.9** tons per consecutive twelve month period.
- (b) During the first twelve (12) months of operation, the amount of any single hazardous air pollutant (HAP) delivered to the applicators shall be limited such that the total usage divided by the accumulated months of operation shall not exceed 9.9 total tons per year divided by twelve (12) months, which equals 0.825 tons per month, rolled on a monthly basis.**
- ~~(b)~~(c) The amount of any combination of HAPs delivered to the applicators shall not exceed 24.0 tons per consecutive twelve month period.
- (d) During the first twelve (12) months of operation, the amount of any combination of HAPs delivered to the applicators shall be limited such that the total usage divided by the accumulated months of operation shall not exceed 24.0 total tons per year divided by twelve (12) months, which equals 2.0 tons per month, rolled on a monthly basis.**

Therefore, the requirements of 326 IAC 2-7 do not apply.

This response also pertains to the twelve month period referred to in Section D.1.8.

Comment 8:

D.1.3 - In the last sentence of paragraph 1, "calendar" is misspelled.

Response 8:

D.1.3 has been changed as follows:

D.1.3 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 the metal tanks and containers fabricated from the cutting, welding and forming operations shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any ~~calendar~~ **calendar** day, for extreme performance 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.

Comment 9:

D.2(b) - Bruco's copy of the permit failed to include Section D.2(a). Please forward for our review and comment. Also see comment D.3 below.

Response 9:

The lettering format found in Section A.2 is used consistently throughout the permit. There is not a Section D.2(a).

Comment 10:

D.2.2 - There is no control equipment for any of the units described in Section D.2(b). Therefore no Preventive Maintenance Plan is required.

Response 10:

See response 12.

Comment 11:

D.2.4 and D.2.5(a) - These emission units do not have an exhaust vent. Exhaust inside the building. It is our understanding that no visible emissions readings are required unless an exhaust point exists. Bruco cannot comply with this requirement.

Response 11:

See response 12.

Comment 12:

D.3 - The equipment listed in Section D.2(b) is correctly included as insignificant. These conditions (D.3.1 and D.3.2) are the only ones that should apply to these emission units. When the application was converted from CP to FESOP this status change should have been made.

Response 12:

The equipment addressed in Section D.2 has been determined to be trivial and as such has been eliminated from the Table of Contents, Section A.2, and Section D. Section D.2 will now address insignificant activities. Section A.2 has also been changed. The changes are as follows:

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:

- (a) One (1) spray coating booth, known as EU-01, constructed in January 1993, equipped with high volume low pressure (HVLP) spray guns and dry filters for particulate matter control, exhausting to Stack 01, capacity: 1.25 metal containers per hour.
- ~~(b) Cutting, forming and welding operations, known as EU-02, constructed in January 1993, consisting of :~~
- ~~(1) Nine (9) metal inert gas welding stations, capacity: 3.5 pounds of wire per hour per welder.~~
 - ~~(2) One (1) portable stick welding station, capacity: 1.0 electrode per hour.~~
 - ~~(3) One (1) tungsten inert gas welding station, capacity: 1.0 pound of metal per hour.~~
 - ~~(4) One (1) plasma cutting station, capacity: 12 inches of metal per minute, 0.75 inches thick.~~

SECTION D.2 FACILITY OPERATION CONDITIONS

- ~~(c) Cutting, forming and welding operations, known as EU-02, constructed in January 1993, consisting of :~~
- ~~(1) Nine (9) metal inert gas welding stations, capacity: 3.5 pounds of wire per hour per welder.~~
 - ~~(2) One (1) portable stick welding station, capacity: 1.0 electrode per hour.~~
 - ~~(3) One (1) tungsten inert gas welding station, capacity: 1.0 pound of metal per hour.~~
 - ~~(4) One (1) plasma cutting station, capacity: 12 inches of metal per minute, 0.75 inches thick.~~

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

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

~~Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the cutting, forming and welding operations shall not exceed 10.4 pounds per hour (45.5 tons per year) when operating at a process weight rate of 4.00 tons per hour.~~

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

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

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

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

Compliance Determination Requirements

~~D.2.3 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]~~

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

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

~~D.2.4 Visible Emissions Notations~~

- ~~(a) Daily visible emission notations of the cutting, forming and welding operations exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- ~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~

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

~~D.2.5 Record Keeping Requirements~~

- ~~(a) To document compliance with Condition D.2.1, the Permittee shall maintain records of daily visible emission notations of the cutting, forming and welding operations exhaust.~~
- ~~(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

SECTION D.32

FACILITY OPERATION CONDITIONS

Insignificant Activities:

The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

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

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

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, **and** welding equipment shall not exceed allowable PM emission rate based on the following equation:

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

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

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

Compliance Determination Requirement

D.3 2.2 Testing Requirements [326 IAC 2-8-5(a)(1), (4)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.3 2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

MINOR SOURCE SCREENING FORMConstruction Permit: F 003-9420-00289Company Name: Bruco Industries, Inc.Location: 4630 Allen Martin Drive, Fort Wayne, Indiana 46806Reviewer: Peter E. FontaineModeler: Peter E. Fontaine

Maximum Permitted Emission Rate (lb/hr)

| Criteria Pollutants | | | | | | Air Toxins | | |
|---------------------|------------------|-------|-----------------|-----------------|-------|---------------|--------|------|
| Stack | PM ₁₀ | CO | SO ₂ | NO _x | Pb | Ethyl benzene | Xylene | MIBK |
| | | | | | | 1.03 | 7.51 | 5.75 |
| | | | | | | | | |
| | | | | | | | | |
| Demin | 3.43 | 22.83 | 9.132 | 9.132 | 0.137 | 3.68 | 3.68 | 1.74 |

Parameters for each emission point and adjacent building. Convert from English to Metric (conversion factors):

[3.28 ft = 1 meter], [1 lb/hr = 0.126 g/s], [(5/9 * (EFahrenheit)) + 255.38 = EKelvin]

| Stack (no.) | Emission Rate (g/s) | Stack Height (m) | Stack Diameter (m) | Flow Rate (m/sec) | Stack Temp. (EK) | Building Height (m) | Building Width (m) | Building Length (m) | Closest Property Line (m) |
|-------------|---------------------|------------------|--------------------|-------------------|------------------|---------------------|--------------------|---------------------|---------------------------|
| S/V 01 | | 8.54 | 0.762 | 7.24 | 293 | 8.23 | 24.2 | 91.5 | 6.86 |
| | | | | | | | | | |
| | | | | | | | | | |

Results ($\mu\text{g}/\text{m}^3$)

| Criteria Pollutants | | | | | | Air Toxins | | |
|---------------------------------------|------------------|----|-----------------|-----------------|----|---------------|---------|---------|
| Max. Conc. | PM ₁₀ | CO | SO ₂ | NO _x | Pb | Ethyl benzene | Xylene | MIBK |
| 1-Hour | | | | | | 337 | 2,451 | 1,879 |
| 3-Hour | | | | | | 303 | 2,206 | 1,691 |
| 8-Hour | | | | | | 236 | 1,715 | 1,315 |
| 24-Hour | | | | | | 135 | 980 | 751 |
| Annual | | | | | | 27.0 | 196 | 150 |
| OSHA PEL ($\mu\text{g}/\text{m}^3$) | | | | | | 435,000 | 435,000 | 205,000 |

Mail to: Permit Administration & Development Section
Office of Air Management
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

- 1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
- 2. I hold the position of _____ for _____.
(Title) (Company Name)
- 3. By virtue of my position with Bruco Industries, Inc., I have personal knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of Bruco Industries, Inc..
- 4. I hereby certify that Bruco Industries, Inc., 4630 Allen Martin Drive, Fort Wayne, IN 46806, has constructed the metal job shop source in conformity with the requirements and intent of the Federally Enforceable State Operating Permit (FESOP) application received by the Office of Air Management on January 28, 1998 and as permitted pursuant to **FESOP No. F 003-9420, Plant ID No. F 003-00289** issued on ____.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 19 _____.

My Commission expires: _____.

Signature

Name (typed or printed)

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

**Company Name: Bruco Industries, Inc.
Address City IN Zip: 4630 Allen Martin Drive, Fort Wayne, IN 46806
FESOP No.: F 003-9420
Plt ID: 003-00289
Reviewer: Peter E. Fountaine
Date: January 28, 1998**

| Material | Density (lb/gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Vol (solids) | Gal of Material (gal/unit) | Maximum (unit/hour) | Flash-off (fraction) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC (lbs/hr) | Potential VOC (lbs/day) | Potential VOC (tons/yr) | Particulate Potential (tons/yr) | VOC solids (lbs/gal) | Transfer Efficiency | Material Substrate |
|----------------------------------|---|------------------------------------|----------------|-------------------|----------------|---------------------------|----------------------------|---------------------|----------------------|---|----------------------------------|------------------------|-------------------------|-------------------------|---------------------------------|----------------------|---------------------|--------------------|
| EU-01 | | | | | | | | | | | | | | | | | | |
| Macro Epoxy 646 (Part A) | 12.55 | 16.60% | 0.0% | 16.60% | 0.0% | 71.0% | 2.27 | 1.25 | 1.0 | 2.08 | 2.08 | 5.91 | 142 | 25.9 | 32.5 | 2.93 | 75% | Metal |
| Macro Epoxy 646 (Part B) | 13.53 | 12.30% | 0.0% | 12.30% | 0.0% | 76.0% | 2.27 | 1.25 | 1.0 | 1.66 | 1.66 | 4.72 | 113 | 20.7 | 36.9 | 2.19 | 75% | Metal |
| Reducer #15 (R7K15) | 6.91 | 100.00% | 0.0% | 100.00% | 0.0% | 0.00% | 0.460 | 1.25 | 1.0 | 6.91 | 6.91 | 3.97 | 95.4 | 17.4 | 0.00 | N/A | 75% | Metal |
| R-T-S | 12.48 | 18.73% | 0.0% | 18.73% | 0.0% | 66.40% | 5.00 | 1.25 | 1.0 | 2.34 | 2.34 | 14.6 | 351 | 64.0 | 69.4 | 3.52 | 75% | Metal |
| State Potential Emissions | Add worst case coating to all solvents | | | | | | | | | | | TOTALS: | 14.6 | 351 | 64.0 | 69.4 | | |

Controlled Emissions due to Surface Coating Operations and Controls

| | | | | | |
|--------------------------|------|--------------------------------|-------------------------------|------------------------|--------------------------------|
| Control Efficiency VOC | PM | Controlled VOC pounds per hour | Controlled VOC pounds per day | Controlled VOC tons/yr | Controlled Particulate tons/yr |
| 0.00 | 0.98 | | | | |
| Controlled Total: | | 14.6 | 351 | 64.0 | 1.39 |

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Flash-off
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs) * Flash-off
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Flash-off
 RTS Density (lbs/gal) = ((Da*Va)+(Db*Vb)+(Dc*Vc))/(Va+Vb+Vc)

HAP Emission Calculations

Company Name: Bruco Industries, Inc.
Plant Location: 4630 Allen Martin Drive, Fort Wayne, IN 46806
County: Allen
FESOP No.: F 003-9420
Pit ID#: 003-00289
Permit Reviewer: Peter E. Fountaine
Date: January 28, 1998

| Material | Density (lbs/gal) | Gal of Mat (gals/unit) | Maximum (units/hour) | Weight % Ethylbenzene | Weight % Xylene | Weight % MIBK | Ethylbenzene Emissions (tons/yr) | Xylene Emissions (tons/yr) | MIBK Emissions (tons/yr) | Total HAPs (tons/yr) | |
|--------------------------|----------------------|---------------------------|-------------------------|--------------------------|--------------------|------------------|--|----------------------------------|--------------------------------|--------------------------------|-------------|
| EU-01 | | | | | | | | | | | |
| Macro Epoxy 646 (Part A) | 12.6 | 2.27 | 1.25 | 2.00% | 14.00% | 0.00% | 3.12 | 21.8 | 0.00 | 25.0 | |
| Macro Epoxy 646 (Part B) | 13.5 | 2.27 | 1.25 | 0.00% | 2.00% | 10.00% | 0.00 | 3.36 | 16.8 | 20.2 | |
| Reducer #15 (R7K15) | 6.91 | 0.460 | 1.25 | 8.00% | 44.00% | 48.00% | 1.39 | 7.66 | 8.35 | 17.4 | |
| TOTALS: | | | | | | | (tons/yr): | 4.51 | 32.9 | 25.2 | 62.5 |
| | | | | | | | (lbs/hr): | 1.03 | 7.51 | 5.75 | 14.3 |
| | | | | | | | (g/sec): | 0.130 | 0.946 | 0.725 | 1.80 |

Total State Potential Emissions

METHODOLOGY

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

**Appendix A: Emissions Calculations
From Welding Operations**

Company Name: Bruco Industries, Inc.
Address City IN Zip: 4630 Allen Martin Drive, Fort Wayne, IN 46806
FESOP No.: F 003-9420
Plt ID: 003-00289
Reviewer: Peter E. Fountaine
Date: January 28, 1998

| Type of Welding | Number of Units | Electrode Type | Maximum Electrode Consumption per Unit (lbs/hr) | Emission Factors (lb pollutant/lb electrode) | | Potential Emissions (tons/year) | |
|--------------------------------|-----------------|----------------|---|--|-----------|---------------------------------|-----------|
| | | | | PM | Manganese | PM | Manganese |
| Metal Inert Gas (MIG) | 9.0 | Carbon Steel | 3.50 | 0.0055 | 0.0005 | 7.59E-01 | 6.90E-02 |
| Stick Welding (portable) | 1.0 | Nickel | 1.00 | 0.0055 | 0.0005 | 2.41E-02 | 2.19E-03 |
| Tungsten Inert Gas (TIG) | 1.0 | Carbon Steel | 1.00 | 0.0000 | 0.0000 | 0.00E+00 | 0.00E+00 |
| Potential Emissions (tons/yr): | | | | | | 7.83E-01 | 7.12E-02 |

| Type of Cutting | Number of Units | Maximum Plate Size (inches) | Maximum Cutting Speed (in/min) | Emission Factors (lb pollutant/1,000,000 ft cut) | | | | | Potential Emissions (tons/yr) | | | | |
|--------------------------|-----------------|-----------------------------|--------------------------------|--|------|-------|------|------|-------------------------------|----------|----------|----------|----------|
| | | | | PM | Cr | Co | Mn | Ni | PM | Cr | Co | Mn | Ni |
| Plasma Arc Cutting (PAC) | 1.0 | 0.75 | 12.0 | 2100 | 4.20 | 0.450 | 6.30 | 1.05 | 5.52E-01 | 1.10E-03 | 1.18E-04 | 1.66E-03 | 2.76E-04 |

| Total Potential Emissions (tons/yr) | | | | |
|-------------------------------------|----------|----------|----------|----------|
| PM | Cr | Co | Mn | Ni |
| 1.33 | 1.10E-03 | 1.18E-04 | 7.28E-02 | 2.76E-04 |

METHODOLOGY

Emissions (tons/yr) = Number of Units * Maximum Electrode Consumption per Unit * Emission Factor (lb pollutant/lb electrode consumed) * 8760 (hrs/yr) * (1 ton/2000 lbs)

Emission Factors are from the SARA 313 Reporting Guide.

Emissions (tons/yr) = number of units * plate size * maximum cutting speed (inches/min) * emission factor (lb pollutant/1,000,000 ft cut) * (1ton/2000lbs)*(8760hrs/1yr)*(1ft/12inches)*(60min/1hr)

Emission Factors are from the SARA 313 Reporting Guide.