

Mr. James L. Kuphal
Valmont Industries, Inc.
57843 Charlotte Avenue
Elkhart, Indiana 46517

Re: **SMF 039-9630**
First Significant Modification to
FESOP 039-5571-00237

Dear Mr. Kuphal:

Valmont Industries, Inc. was issued a permit on December 13, 1996 for a fabricated metal products facility. A letter requesting changes to this permit was received on March 3, 1998. The Office of Air Management has determined that it is necessary to reopen this permit because this modification includes a significant change in existing monitoring conditions by adding daily pressure drop readings for the shotblaster control devices, and removing a stack testing requirement for one of the shotblasters. Pursuant to the provisions of 326 IAC 2-8-11, a significant modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the following changes:

- (1) Removal of the stack testing requirement for the shotblaster EU-03;
- (2) Addition of daily pressure drop readings for the control devices on the shotblasters EU-02 and EU-03;
- (3) Correction of the descriptions of the control equipment for both of the shotblasters;
- (4) Correction of the description of the powder coating facilities;
- (5) Removal of all descriptions relating to the undercoating system; and
- (6) Removal of the maximum capacity from the aluminum wipe down operation (an insignificant activity).

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Vickie Cordell, of my staff, at the above address; or by phone at 317-233-1782 or 1-800-451-6027 (press 0 and ask for extension 3-1782).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

VKC

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Air Compliance Section Inspector - Greg Wingstrom
Compliance Data Section - Jerri Curless
Administrative and Development - Janet Mobley
Technical Support and Modeling - Nancy Landau

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 1-800-451-6027

**Valmont Industries, Inc.
57843 and 58027 Charlotte Avenue
Elkhart, Indiana 46517**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F039-5571-00237	
Original issued by Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: December 13, 1996
First Significant Permit Modification: SMF 039-9630-00237	Pages Affected: 2, 3, 4, 5, 16, 17, 21, 22, 24; 18a & 18b supersede 18; 23a & 23b supersede 23; 25a & 25b supersede 25
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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

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

The Permittee owns and operates a fabricated metal products facility.

Responsible Official: Mr. James L. Kuphal
Source Address: 57843 and 58027 Charlotte Avenue, Elkhart, Indiana 46517
Mailing Address: 57843 Charlotte Avenue, Elkhart, Indiana 46517
SIC Code: 3499
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD
Major Source, Section 112 of the Clean Air Act

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

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

- (a) one (1) paint spray booth, located at 57843 Charlotte Avenue, identified as EU-01, equipped with one (1) high pressure airless spray gun, at a maximum coating capacity of 0.626 units per hour, with dry filters, identified as CD-01, for overspray control, exhausting at one (1) stack, identified as E1;
- (b) Two (2) powder coating booths, located at 58027 Charlotte Avenue, identified as EU-04A and EU-04B; EU-04B is also known as the small parts line. Booth EU-04A has a maximum coating rate of 21.33 pounds per hour and is equipped with two (2) electrostatic applicators, exhausting indoors through two (2) cartridge type dust collectors identified as CD-04a and CD-04b. Booth EU-04B has a maximum coating rate of 10.67 pounds per hour and is equipped with one (1) electrostatic applicator, exhausting indoors through one (1) cartridge type dust collector identified as CD-04c;
- (c) one (1) shotblaster, located at 57843 Charlotte Avenue, identified as EU-02, utilizing steel shot, with a maximum blast rate of 35.4 tons of steel shot per hour, exhausting through cartridge filters identified as CD-02, vented indoors;
- (d) one (1) shotblaster, located at 58027 Charlotte Avenue, identified as EU-03, utilizing steel shot, with a maximum blast rate of 108 tons of steel shot per hour, exhausting through cartridge filters identified as CD-03 to a HEPA filter, vented indoors.

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 which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) one (1) natural gas fired radiant heater, identified as H1, with a maximum rated capacity of 0.25 million British thermal units per hour, exhausting at one (1) stack;
- (b) thirteen natural gas fired radiant heaters, identified as H2 - H14, each heater with a maximum rated capacity of 0.5 Million British thermal units per hour, each heater exhausting at one (1) stack;

- (c) one (1) natural gas fired make up air unit, with a maximum rated capacity of 1.5 million British thermal units per hour;
- (d) one (1) natural gas fired heating unit, with a maximum capacity of 3.75 million British thermal units per hour;
- (e) two (2) natural gas fired bake ovens, each with a maximum rated capacity of 3.0 million British thermal units per hour;
- (f) MIG welding stations;
- (g) gas metal arc welding;
- (h) a petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (i) paved and unpaved roads and parking lots with public access;
- (j) burn tables;
- (k) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute;
- (l) oxyacetylene cutting torches;
- (m) cutting of metal parts; and
- (n) aluminum wipe down operation.

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).

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

Pursuant to 326 IAC 2-8, emissions of any regulated pollutant from the entire source shall not exceed 99 tons per 365 day period. Emissions of hazardous air pollutants (HAP) from the entire source shall not exceed 9 tons per 365 day period for any individual HAP or 24 tons per 365 day period of any combination of HAPs. Emissions shall include those from all emission points at the source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, as long as the total emissions from the source do not exceed the above specified limits. In the event that any condition or combination of conditions in Section D of this permit differs from the above, the most restrictive limit will prevail.

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6)-minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1)-minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning

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

C.4 Fugitive Dust Emissions

The Permittee shall be in violation of 326 IAC 6-4 if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated.

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

- (a) All equipment that potentially might emit pollutants into the ambient air shall be properly operated and maintained.
- (b) Unless otherwise stated in this permit, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.
- (c) The Permittee shall perform all necessary maintenance and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times.

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

C.6 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 [326 IAC 2-8-5(a)(1)]

C.7 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 (this time frame is determined on a case by case basis, but 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.8 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

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

C.9 Monitoring Methods [326 IAC 3]

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

C.10 Pressure Gauge Specifications

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

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

C.11 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.12 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).

SECTION D.1

FACILITY OPERATION CONDITIONS

One (1) paint spray booth, located at 57843 Charlotte Avenue, identified as EU-01, equipped with one (1) high pressure airless spray gun, at a maximum coating capacity of 0.626 units per hour, with dry filters, identified as CD-01, for overspray control, exhausting at one (1) stack, identified as E1.

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

D.1.1 Volatile Organic Compounds

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), and Registration CP-039-3605, issued on June 13, 1994, the volatile organic compound (VOC) content of coating applied to miscellaneous metal components shall be limited to 3.5 pounds of VOC per gallon of coating less water, for extreme performance coatings.

D.1.2 Solvent Usage

Pursuant to 326 IAC 8-2-9(f), the 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.1.3 Particulate Matter Overspray

The particulate matter (PM) overspray control shall be in operation at all times when the paint spray booth is in operation. Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations), the PM from the spray booth EU-01 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

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

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for this facility and any control.

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

D.1.5 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (E1) while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission is observed. If no overspray emission is usually observed, evidence of any overspray emission will be considered a noticeable change. 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.1.6 Volatile Organic Compound (VOC) Usage

The Permittee shall maintain records at the source of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or VOC emission limits established in this permit. The records shall contain a minimum of the following:

- (a) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;
- (b) The VOC content (weight percent) of each material used; and
- (c) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, if applicable.

D.1.7 Record Keeping Requirements

The Permittee shall maintain records at the stationary source of:

- (a) Daily inspections of the filters;
- (b) Weekly observations and monthly inspections of stack particulate matter overspray emissions;
- (c) Other inspections as specified in the Preventive Maintenance Plan;
- (d) Checklist with dates and initials for each preventive action performed; and
- (e) Records of corrective actions.

D.1.8 Reporting

Any deviations shall be reported in accordance with Condition B.15 and summarized in the annual certification submitted in accordance with Condition C.13.

SECTION D.2

FACILITY OPERATION CONDITIONS

Two (2) powder coating booths, located at 58027 Charlotte Avenue, identified as EU-04A and EU-04B; EU-04B is also known as the small parts line. Booth EU-04 A has a maximum coating application rate of 21.33 pounds per hour and is equipped with two (2) electrostatic applicators, exhausting indoors through two (2) cartridge type dust collectors identified as CD-04a and CD-04b. Booth EU-04B has a maximum coating application rate of 10.67 pounds per hour and is equipped with one (1) electrostatic applicator, exhausting indoors through one (1) cartridge type dust collector identified as CD-04c.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The particulate matter (PM) control shall be in operation at all times when the powder coating process is in operation. Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations), the PM from each of the two (2) powder coating booths (EU-04A and EU-04B) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for this facility and any control.

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

D.2.3 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the cartridge filters.
- (b) If a powder coating booth, EU-04A or EU-04B, is exhausted to the atmosphere, weekly observations shall be made of the overspray emissions from the stack while the booth is in operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emissions, 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)]

D.2.4 Record Keeping Requirements

The Permittee shall maintain records at the stationary source of:

- (a) Daily inspections of the cartridge filters;
- (b) Any required weekly inspections of stack particulate matter overspray emissions;

- (c) Other inspections as specified in the Preventive Maintenance Plan;
- (d) Checklist with dates and initials for each preventive action performed; and
- (e) Records of corrective actions.

D.2.5 Reporting

Any deviations shall be reported in accordance with Condition B.15 and summarized in the annual certification submitted in accordance with Condition C.13.

SECTION D.3

FACILITY OPERATION CONDITIONS

One (1) shotblaster, located at 57843 Charlotte Avenue, identified as EU-02, utilizing steel shot, with a maximum blast rate of 35.4 tons of steel shot per hour, exhausting through cartridge filters identified as CD-02, vented indoors; and

One (1) shotblaster, located at 58027 Charlotte Avenue, identified as EU-03, utilizing steel shot, with a maximum blast rate of 108 tons of steel shot per hour, exhausting through cartridge filters identified as CD-03 to a HEPA filter, vented indoors.

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

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

The particulate matter (PM) control shall be in operation at all times when the shotblasters, EU-02 and EU-03, are in operation. Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the shot blasting systems EU-02 and EU-03 shall not exceed 6.06 and 13.83 pounds per hour, respectively, when operating at a process weight rate of 35.4 and 108 tons per hour, respectively.

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

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

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

D.3.2 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 and its control device.

Compliance Determination Requirements

D.3.3 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.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

If the exhaust from shotblaster EU-03 is redirected to the atmosphere, the Permittee shall perform PM and PM-10 testing of that facility utilizing Methods 5 or 7 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner. This test shall be performed within 180 days of the date the exhaust is rerouted to the atmosphere and shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10.

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

D.3.4 Visible Emissions Notations

(a) Daily visible emission notations of the shot blaster (EU-02 and EU-03) stack 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.

D.3.5 Parametric Monitoring

The Permittee shall record the total static pressure drop across each cartridge filter unit and HEPA filter used in conjunction with the shotblasting process, at least once daily when the shotblasting process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each cartridge filter unit, CD-02 and CD-03, shall be maintained within the range of 2.0 and 8.0 inches of water or a range established during the latest stack test; the pressure drop across the HEPA filter shall be maintained within the range of 0.5 and 2.0 inches or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

D.3.6 Broken or Failed Control Equipment Detection

In the event that failure of the control equipment has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment control devices, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.3.7 Record Keeping Requirements

The Permittee shall maintain daily record of the following values:

- (a) To document compliance with Condition D.3.4, the Permittee shall maintain records of daily visible emission notations of the shotblaster stack exhaust when venting to the atmosphere.

- (b) To document compliance with Condition D.3.5, the Permittee shall maintain the following:
 - (1) Daily records of the inlet and outlet differential static pressure during normal operation when venting to the atmosphere:
 - (2) Documentation of all response steps implemented, per event .
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.8 Reporting

Any deviations shall be reported in accordance with Condition B.15 and summarized in the annual certification submitted with Condition C.13.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Significant Modification to a Federally Enforceable State Operating Permit (FESOP)

Source Background And Description

Source Name: Valmont Industries, Inc.
Source Location: 57843 and 58027 Charlotte Avenue, Elkhart, Indiana 46517
County: Elkhart
SIC Code: 3499
Operation Permit No.: F 039-5571-00237
Modification No.: SMF 039-9630
Permit Reviewer: Vickie Cordell

The Office of Air Management (OAM) has reviewed a request for a modification to a Federally Enforceable State Operating Permit (FESOP), F 039-5571-00237, issued to Valmont Industries, Inc. relating to the operation of a fabricated metal products manufacturing facility. The source requested the following changes:

- (1) Removal of the stack testing requirement for the shotblaster EU-03;
- (2) Correction of the description of the powder coating facilities;
- (3) Removal of the maximum capacity from the aluminum wipe down operation (an insignificant activity).

Permitted Emission Units and Pollution Control Equipment

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

- (1) one (1) paint spray booth, located at 57843 Charlotte Avenue, identified as EU-01, equipped with one (1) high pressure airless spray gun, at a maximum coating capacity of 0.626 units per hour, with dry filters, identified as CD-01, for overspray control, exhausting at one (1) stack, identified as E1;
- (2) two (2) powder coating booths, located at 58027 Charlotte Avenue, identified as EU-04A and EU-04B; EU-04B is also known as the small parts line. Booth EU-04 A has a maximum coating rate of 21.33 pounds per hour and is equipped with two (2) electrostatic applicators, exhausting indoors through two (2) cartridge type dust collectors identified as CD-04a and CD-04b. Booth EU-04B has a maximum coating rate of 10.67 pounds per hour and is equipped with one (1) electrostatic applicator, exhausting indoors through one (1) cartridge type dust collector identified as CD-04c;
- (3) one (1) shotblaster, located at 57843 Charlotte Avenue, identified as EU-02, utilizing steel shot, with a maximum blast rate of 35.4 tons of steel shot per hour, exhausting through cartridge filters identified as CD-02, vented indoors;
- (4) one (1) shotblaster, located at 58027 Charlotte Avenue, identified as EU-03, utilizing steel shot, with a maximum blast rate of 108 tons of steel shot per hour, exhausting through cartridge filters identified as CD-03 to a HEPA filter, vented indoors.

(Note: An undercoating process, identified as the plural component urethane system, has been removed from the FESOP. This process had been included in the FESOP as new equipment to be added within 18 months of the issuance date. However, the process has been determined by the source to be unneeded and will not be installed. Therefore, references to the system have been removed from the Table of Contents, the Source Summary, and Section D.1.)

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

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

Insignificant Activities

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

- (a) one (1) natural gas fired radiant heater, identified as H1, with a maximum rated capacity of 0.25 million British thermal units per hour, exhausting at one (1) stack;
- (b) thirteen natural gas fired radiant heaters, identified as H2 - H14, each heater with a maximum rated capacity of 0.5 Million British thermal units per hour, each heater exhausting at one (1) stack;
- (c) one (1) natural gas fired make up air unit, with a maximum rated capacity of 1.5 million British thermal units per hour;
- (d) one (1) natural gas fired heating unit, with a maximum capacity of 3.75 million British thermal units per hour;
- (e) two (2) natural gas fired bake ovens, each with a maximum rated capacity of 3.0 million British thermal units per hour;
- (f) MIG welding stations;
- (g) gas metal arc welding;
- (h) a petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (i) paved and unpaved roads and parking lots with public access;
- (j) burn tables;
- (k) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute;
- (l) oxyacetylene cutting torches;
- (m) cutting of metal parts; and
- (n) aluminum wipe down operation.

Recommendation

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

Removal of the stack test requirement and correction of the powder coating facility description has been recommended by the OAM inspector for Elkhart County. Repeated inspections have found Valmont to use excellent industrial hygiene and pollution control practices. The exhaust from shotblaster EU-03 is controlled by primary (cartridge) and secondary (HEPA) filters; each control has a differential pressure gauge to monitor performance. A daily parametric monitoring requirement has been added for the filters on shotblasters EU-02 and EU-03. In addition, the exhaust is vented next to the powder coating operation and any PM emission would contaminate the coating. Therefore, there is a strong economic incentive for the source to prevent control failure.

The November 10, 1997 inspection report (attached) notes that shotblaster EU-03 is vented into the middle of an 80,000+ sq. ft. building; the nearest building opening is over 100 feet from the exhaust point. The secondary filtration would make testing difficult and would require an extension to be built onto the end of the exhaust.

The source originally planned to have the powder coating operation combined in a single booth, to be identified as EU-4; however, logistics and space did not allow. The applicators and coating capacity permitted for the single booth have been split between the two, there is no increase in potential emissions. EU-04A is the main powder coating application booth (currently used for coating light poles), EU-04B is known as the small parts line. The description has been changed for clarity. (The booths share a curing oven which is included in the insignificant activities.)

The maximum capacity information provided in the application for the aluminum wipe down operation was taken from another, similar plant but is not really accurate for this source. The source is actually using no solvent, just dry wipe down. Even if solvent were to be used, it would be an insignificant activity. Calculations done for the FESOP Technical Support Document found the wipe down emissions to be trivial.

Emissions Calculations

There has been no change in any emissions calculated for the FESOP.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status (attainment or unclassifiable/ severe, moderate, marginal, or maintenance nonattainment)
TSP	Attainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Maintenance Nonattainment
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. Elkhart County has been designated as maintenance for ozone, and attainment for all other criteria pollutants.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (326 IAC 12, 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

There has been no change in any State rule applicability to the entire source.

State Rule Applicability - Individual Facilities (Powder Coating Operations)

Note: Only conditions which have been changed from those in the original FESOP have been included here.

326 IAC 6-3-2 (Particulate Matter (PM))

The particulate matter (PM) control shall be in operation at all times when the powder coating process is in operation. Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations), the PM from each of the two (2) powder coating booths (EU-04A and EU-04B) shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

Compliance is shown by the use of cartridge type dust collectors for PM control.

(**Note:** This condition has been changed to reflect changes in the application of 326 IAC 6-3-2 to coating operations since the FESOP was written.)

State Rule Applicability - Individual Facilities (Shot Blasters)

326 IAC 6-3-2 (Particulate Matter (PM))

The particulate matter (PM) control shall be in operation at all times when the shotblasters, EU-02 and EU-03, are in operation. Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the shot blasting systems EU-02 and EU-03 shall not exceed 6.06 and 13.83 pounds per hour, respectively, when operating at a process weight rate of 35.4 and 108 tons per hour, respectively.

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

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

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

Compliance is shown by the use of cartridge type dust collectors and a HEPA filter for PM control.

(**Note:** The wording of this condition has been changed to maintain consistency with the Particulate Matter condition for the powder coating operations. There has been no change in the PM allowable for the shot blasters.)

326 IAC 2-8-5(a)(1), (4) (Testing Requirements)

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.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

If the exhaust from shotblaster EU-03 is redirected to the atmosphere, the Permittee shall perform PM and PM-10 testing of that facility utilizing Methods 5 or 7 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM-10, or other methods as approved by the Commissioner. This test shall be performed within 180 days of the date the exhaust is re-rerouted to the atmosphere and shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10.

(Note: This condition has been changed because it has been determined that the stack testing originally required in the FESOP for EU-03 is not necessary, provided that there is no change in the particulate matter control methods, the source conducts daily pressure drop readings for the control devices, and EU-03 continues to be vented into the building.)

Compliance Requirements

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

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

1. The compliance monitoring condition for the powder coating application booths, identified as EU-04A and EU-04B, has been written as follows:

No monitoring is necessary providing all venting is inside the building.

(Note: This is the same wording used in the original FESOP. It was erroneously stated in the FESOP Technical Support Document that daily visible emissions observations were required at the powder coating system dust collectors.)

2. The shotblasters, identified as EU-02 and EU-03, have applicable compliance monitoring conditions as specified below:

Visible Emissions Notations

- (a) Daily visible emission notations of the shot blaster (EU-02 and EU-03) stack 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.

Parametric Monitoring

The Permittee shall record the total static pressure drop across each cartridge filter unit and HEPA filter used in conjunction with the shotblasting process, at least once daily when the shotblasting process is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each cartridge filter unit, CD-02 and CD-03, shall be maintained within the range of 2.0 and 8.0 inches of water or a range established during the latest stack test; the pressure drop across the HEPA filter shall be maintained within the range of 0.5 and 2.0 inches or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

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

Broken Bag or Failure Detection

In the event that failure of the control equipment has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion

These monitoring conditions are necessary because the PM control for the shotblasters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this fabricated metal products facility will be subject to the conditions of the attached proposed FESOP Significant Modification No. SMF 039-9630-00237.

Indiana Department of Environmental Management Office of Air Management

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

Source Name: **Valmont Industries, Inc.**
Source Location: **57843 and 58027 Charlotte Avenue, Elkhart, IN 46517**
County: **Elkhart**
SIC Code: **3499**
Operation Permit No.: **SMF 039-9630-00237**
Permit Reviewer: **Vickie Cordell**

On October 16, 1998, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Valmont Industries, Inc. had applied for a Significant Permit Modification to a Federally Enforceable State Operation Permit (FESOP) for a fabricated metal products facility. The notice also provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 13, 1998, Bruce Carter Associates, L.L.C. submitted comments on behalf of Valmont Industries, Inc. on the proposed Modification. The summary of the comments is as follows (bolded language has been added, the language with a line through it has been deleted).

Comment 1:

Condition D.2.4(b) requires "weekly inspections of stack particulate matter over spray emissions". Valmont requests that this condition be removed as there are no stacks associated with this process, only cartridge filters that exhaust to the interior of the building.

Response 1:

The descriptive information that the powder coating booths exhaust indoors is not an enforceable condition. Also, it does not make sense for Condition D.2.4 (Operational Parameters, now renamed Record Keeping Requirements) to require records of daily inspections of the cartridge filters, and Condition D.2.3 (Monitoring) to state that no monitoring is necessary. Therefore, Conditions D.2.3 and D.2.4 have been amended as follows:

D.2.3 Monitoring

~~No monitoring is necessary providing all venting is inside the building.~~

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the cartridge filters.
- (b) If a powder coating booth, EU-04A or EU-04B, is exhausted to the atmosphere, weekly observations shall be made of the overspray emissions from the stack while the booth is in operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emissions, 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.

D.2.4 Operational Parameters Record Keeping Requirements

The Permittee shall maintain records at the stationary source of:

- (a) Daily inspections of the cartridge filters;
- (b) **Any required weekly** ~~Weekly~~ inspections of stack particulate matter overspray emissions;
- (c) Other inspections as specified in the Preventive Maintenance Plan;
- (d) Checklist with dates and initials for each preventive action performed; and
- (e) Records of corrective actions.

Comment 2:

Condition D.3.6(a) (Broken Bag or Failure Detection) requires that in the event of a broken bag or failure detection that "the affected compartments will be shut down immediately until the failed units have been repaired or replaced". This is contrary to the allowances provided in Condition B.14, Emergency Provisions. Valmont requests that this condition, D.3.6(a) be changed to allow for operation under the emergency condition provided in Condition B.14.

Response 2:

To include references for emergency provisions, the condition wording has been changed to the current model wording. The wording has also been corrected from "baghouses" to "control equipment". The condition is now as follows:

D.3.6 Broken or Failed Bag or Failure Control Equipment Detection

In the event that failure of the control equipment has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~ (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. **Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) **For single compartment control devices, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. The OAM has re-evaluated the compliance monitoring provisions related to evidence of actual emissions from the paint booths and believes that less resource intensive provisions are appropriate. The frequency of visible emissions evaluations has been changed from daily to weekly. The frequency of inspections of rooftops or other surfaces for a noticeable change in solids deposition has been changed from weekly to monthly. Condition D.1.5 (Monitoring) and D.1.7 (Operational Parameters, now renamed Record Keeping Requirements) have been amended as follows:

D.1.5 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray from the surface coating booth stack (E1) while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission is observed. If no overspray emission is usually observed, evidence of any overspray emission will be considered a noticeable change. 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.

D.1.7 Operational Parameters Record Keeping Requirements

The Permittee shall maintain records at the stationary source of:

- (a) Daily inspections of the filters;
- (b) Weekly **observations and monthly** inspections of stack particulate matter overspray emissions;
- (c) Other inspections as specified in the Preventive Maintenance Plan;
- (d) Checklist with dates and initials for each preventive action performed; and
- (e) Records of corrective actions.

2. Condition C.2 (Opacity) has been modified for consistency with the November 1, 1998 update to 326 IAC 5. The condition is now as follows:

C.2 Opacity [326 IAC 5-1]

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

- (a) ~~Visible emissions Opacity~~ shall not exceed an average of thirty percent (30%) ~~opacity in twenty-four (24) consecutive readings,~~ **in any one (1) six (6)-minute averaging period** as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions Opacity~~ shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1)-minute non-overlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

The Table of Contents and page numbers have been changed as needed.