

**CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT**

**New Venture Gear, Inc
1200 West 8th Street
Muncie, Indiana 47307**

is hereby authorized to construct

- (a) One (1) nozzle shot peen 225, equipped with a cartridge-type baghouse dust collector, capacity: 6,000 pounds per hour of steel shot.
- (b) One (1) nozzle shot peen 448208-2, equipped with a cannister-type baghouse dust collector, capacity: 6,000 pounds per hour of steel shot.
- (c) One (1) rebuilt nozzle shot peen, equipped with a cartridge-type baghouse dust collector, capacity: 6,000 pounds per hour of steel shot.
- (d) One (1) double wheel shot peen 999, equipped with a baghouse dust collector, capacity: 36,000 pounds per hour of steel shot.

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP 035-9670-00015	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Construction Conditions

General Construction Conditions

1. That the data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).
2. That this permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. That pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.
4. That pursuant to 326 IAC 2-1-9(b)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. That notwithstanding Construction Condition No. 6, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

6. That this document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:
 - (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
 - (c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
 - (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).
 - (e) The Permittee has submitted their Part 70 (T-035-7145) application on November 13, 1996 for the existing source. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

7. That when the facility is constructed and placed into operation the following operation conditions shall be met:

Operation Conditions

General Operation Conditions

1. That the data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).
2. That the Permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder.

Preventive Maintenance Plan

3. That pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:
- (a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.
 - (b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.
 - (c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

Transfer of Permit

4. That pursuant to 326 IAC 2-1-6 (Transfer of Permits):
- (a) In the event that ownership of these shot blasters are changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.
 - (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.
 - (c) The OAM shall reserve the right to issue a new permit.

Permit Revocation

5. That pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:
- (a) Violation of any conditions of this permit.

- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

Availability of Permit

6. That pursuant to 326 IAC 2-1-3(I), the Permittee shall maintain the applicable permit on the premises of this source and shall make this permit available for inspection by the IDEM, or other public official having jurisdiction.

Performance Testing

7. That pursuant to 326 IAC 2-1-3 (Construction and Operating Permit Requirements) compliance stack tests shall be performed for each of the four (4) abrasive blasting units for particulate matter and PM₁₀ emissions within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. These tests shall verify the PM and PM₁₀ emission factors and shall be performed according to 326 IAC 3-2.1 (Source Sampling Procedures) using the methods specified in the rule or as approved by the Commissioner.
- (a) A test protocol shall be submitted to the OAM, Compliance Data Section, 35 days in advance of the test.
 - (b) The Compliance Data Section shall be notified of the actual test date at least two (2) weeks prior to the date.
 - (c) All test reports must be received by the Compliance Data Section within 45 days of completion of the testing.
 - (d) Whenever the results of the stack test performed exceed the level specified in this permit, appropriate corrective actions shall be implemented within thirty (30) days of receipt of the test results. These actions shall be implemented immediately unless notified by OAM that they are acceptable. The Permittee shall minimize emissions while the corrective actions are being implemented.
 - (e) Whenever the results of the stack test performed exceed the level specified in this permit, a second test to demonstrate compliance shall be performed within 120 days. Failure of the second test to demonstrate compliance may be grounds for immediate revocation of this permit to operate the affected facility.

Annual Emission Reporting

8. That pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must annually submit an emission statement for the source. This statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. A copy of this rule is enclosed. The annual statement must be submitted to:

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

The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30.

Malfunction Condition

9. That pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

Opacity Limitations

10. That pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

- (a) visible emissions shall not exceed an average of 40 percent opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60 percent opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

11. Particulate Matter (PM) Limitation

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements), the allowable PM emissions from the nozzle shot preen 225, nozzle shot preen 448208-2 and the rebuilt nozzle shot preen shall not exceed 0.867 pounds per hour, each. The allowable PM emissions from the double wheel shot preen 999 shall not exceed 2.88 pounds per hour. These PM emission limits, equivalent to 24.0 tons per year, make 326 IAC 2-2 not applicable, and also satisfy the requirements of 326 IAC 6-3 (Process Operations).

Baghouse Operating Condition

12. That the baghouses associated with each of the four (4) abrasive blasting units shall be operated at all times when the abrasive blasting is in operation. This condition will make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (a) An inspection shall be performed each calendar quarter of all the baghouses. Defective bags shall be replaced. A record shall be kept of the results of the inspection and the number of bags replaced.
 - (b) In the event that a bag's failure has been observed:
 - (i) The affected compartments will be shut down immediately until the failed units have been replaced.
 - (ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

Fugitive Dust Emissions

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

Emergency Reduction Plans

14. Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):
- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
 - (b) These ERPs shall be submitted for approval to:

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

within 180 calendar days from the issuance date of this permit.
 - (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, IDEM, OAM (and local agency), shall supply such a plan.
 - (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate level. [326 IAC 1-5-3]

Open Burning

15. That 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.

16. PM₁₀ Limitation

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements, the allowable PM₁₀ emissions from the nozzle shot preen 225, nozzle shot preen 448208-2 and the rebuilt nozzle shot preen shall not exceed 0.506 pounds per hour, each. The allowable PM₁₀ emissions from the double wheel shot preen 999 shall not exceed 1.68 pounds per hour. These PM₁₀ emission limits, equivalent to 14.0 tons per year, make 326 IAC 2-2 not applicable.

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. The requirements of this rule (326 IAC 1-6) shall apply to the owner or operator of any facility which has the potential to emit twenty-five (25) pounds per hour of particulates, one hundred (100) pounds per hour of volatile organic compounds or SO₂, or two thousand (2,000) pounds per hour of any other pollutant; or to the owner or operator of any facility with emission control equipment which suffers a malfunction that causes emissions in excess of the applicable limitation.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. (Air Pollution Control Board; 326 IAC 1-2-39; filed Mar 10, 1988, 1:20 p.m.: 11 IR 2373)

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name: New Venture Gear, Inc.
Source Location: 1200 West 8th Street, Muncie, Indiana 47307
County: Delaware
Construction Permit No.: CP 035-9670-00015
SIC Code: 3714
Permit Reviewer: Frank P. Castelli

The Office of Air Management (OAM) has reviewed an application from New Venture Gear, Inc. relating to the construction and operation of four (4) abrasive blasting units as described below:

- (a) One (1) nozzle shot peen 225, equipped with a cartridge-type baghouse dust collector, capacity: 6,000 pounds per hour of steel shot.
- (b) One (1) nozzle shot peen 448208-2, equipped with a cannister-type baghouse dust collector, capacity: 6,000 pounds per hour of steel shot.
- (c) One (1) rebuilt nozzle shot peen, equipped with a cartridge-type baghouse dust collector, capacity: 6,000 pounds per hour of steel shot.
- (d) One (1) double wheel shot peen 999, equipped with a baghouse dust collector, capacity: 36,000 pounds per hour of steel shot.

This proposed equipment represents a minor modification to an existing major source. The applicant has requested that this application be processed prior to the issuance of their Part 70 Permit. Stack testing of the PM emissions is being required in order to verify the PM emission factors cited in the application. These emission factors were used to calculate the potential PM and PM₁₀ emissions.

Stack Summary

There are no stacks associated with the four (4) blasting units. All emissions, after control, are vented inside the building.

Enforcement Issue

There are no enforcement actions pending for this source.

Recommendation

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

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

A complete application for the purposes of this review was received on April 13, 1998.

Emissions Calculations

See pages 1 through 2 of 2 of Appendix A (Emissions Calculation Spreadsheets) for detailed calculations.

Total Potential and Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/yr)	Potential Emissions (tons/yr)
Particulate Matter (PM)	237	53.2
Particulate Matter (PM ₁₀)	45.8	45.8
Sulfur Dioxide (SO ₂)	0.00	0.00
Volatile Organic Compounds (VOC)	0.00	0.00
Carbon Monoxide (CO)	0.00	0.00
Nitrogen Oxides (NO _x)	0.00	0.00
Single Hazardous Air Pollutant (HAP)	0.004	0.004
Combination of HAPs	0.013	0.013

- (a) Allowable emissions are determined from the applicability of rule 326 IAC 6-3. See attached spreadsheets for detailed calculations.
- (b) The potential PM emissions before control are less than the allowable emissions, therefore, the potential PM emissions before control are used for the permitting determination.
- (c) Allowable emissions (as defined in the Indiana Rule) of PM and PM₁₀ are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

County Attainment Status

- (a) 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. Delaware County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (b) Delaware County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	0.73
PM ₁₀	0.66
SO ₂	931
VOC	202
CO	65.0
NO _x	807

- (a) This existing source is a major stationary source because while it is not in one of the 28 listed source categories, at least one attainment regulated pollutant is emitted at a rate of 250 tons per year.
- (b) These emissions were based on the AIRS Facility Quick Look Report, dated March 30, 1998.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (tons/yr)	PM₁₀ (tons/yr)	SO₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO_x (tons/yr)
Proposed Modification	0.532	0.458	0.00	0.00	0.00	0.00
Contemporaneous Increases	0.00	0.00	0.00	0.00	0.00	0.00
Contemporaneous Decreases	0.00	0.00	0.00	0.00	0.00	0.00
Net Emissions	0.532	0.458	0.00	0.00	0.00	0.00
PSD Significant Level	25	15	40	40	100	40

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T-035-7145-00015) application on November 13, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

There are no New Source Performance Standards (326 IAC 12) and 40 CFR Part 63 applicable to these facilities.

State Rule Applicability

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because the source emits more than 100 tons per year of sulfur dioxide and nitrogen oxides. Pursuant to this rule, the owner/ operator of this source must annually submit an emission statement of the facility. The annual statement must be received by July 1 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

326 IAC 5-1-2 (Visible Emission Limitations)

The visible emissions from this source are subject to this rule. The rule requires that opacity be less than an average of forty (40) percent in twenty-four (24) consecutive readings and less than sixty (60) percent for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6)-hour period.

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

The PM emissions from the shot blasting operations shall comply with 326 IAC 6-3-2(c). The applicable 326 IAC 6-3-2 equation is as follows: $E = 4.10 P^{0.67}$, where P equals process weight rate in tons per hour for process weights up to and including sixty thousand (60,000) pounds per hour and E equals the allowable emission rate in pounds per hour. This rule limits PM emissions from the nozzle shot preen 225, nozzle shot preen 448208-2 and the rebuilt nozzle shot preen to 8.56 pounds per hour for each of the three (3) units based upon a process weight of 6,000 pounds per hour of steel shot. The rule limits the PM emissions from the double wheel shot preen 999 to 28.4 pounds per hour based upon a process weight of 36,000 pounds per hour of steel shot. The four (4) shot blasters comply with this rule since after controls, the hourly PM emissions are 0.013 tons per hour for three (3) with identical process rate weights of 6,000 pounds per hour and 0.081 pounds per hour for the remaining abrasive blasting unit.

Air Toxic Emissions

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

- (a) This modification will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to the Clean Air Act.

- (b) See page 2 of 2 of the attached spreadsheet in Appendix A for detailed toxic calculations.

Conclusion

The construction of these four (4) abrasive blasting units will be subject to the conditions of the attached proposed **Construction Permit No. CP 035-9670-00015**.

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

Addendum to the
Technical Support Document for New Construction and Operation

Source Name: New Venture Gear, Inc.
Source Location: 1200 West 8th Street, Muncie, Indiana 47307
County: Delaware
Construction Permit No.: CP 035-9670-00015
SIC Code: 3714
Permit Reviewer: Frank P. Castelli

On May 8, 1998, the Office of Air Management (OAM) had a notice published in the Muncie Star Press, Muncie, Indiana, stating that New Venture Gear, Inc. had applied for a construction permit to construct and operate four (4) abrasive blasting units with baghouses for particulate matter control. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to this Construction Permit.

Condition 11 has been revised from

11. Particulate Matter (PM) Limitation

Pursuant to 326 IAC 6-3 (Process Operations), the PM emissions from the nozzle shot preen 225, nozzle shot preen 448208-2 and the rebuilt nozzle shot preen shall not exceed the allowable particulate matter (PM) emission rate of 8.56 pounds per hour for each of these three (3) units. The PM emissions from the double wheel shot preen 999 shall not exceed the allowable particulate matter (PM) emission rate of 28.4 pounds per hour.

to:

11. Particulate Matter (PM) Limitation

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements), the allowable PM emissions from the nozzle shot preen 225, nozzle shot preen 448208-2 and the rebuilt nozzle shot preen shall not exceed 0.867 pounds per hour, each. The allowable PM emissions from the double wheel shot preen 999 shall not exceed 2.88 pounds per hour. These PM emission limits, equivalent to 24.0 tons per year, make 326 IAC 2-2 not applicable, and also satisfy the requirements of 326 IAC 6-3 (Process Operations).

Condition 16 has been added as follows:

16. PM₁₀ Limitation

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements), the allowable PM₁₀ emissions from the nozzle shot preen 225, nozzle shot preen 448208-2 and the rebuilt nozzle shot preen shall not exceed 0.506 pounds per hour, each. The allowable PM₁₀ emissions from the double wheel shot preen 999 shall not exceed 1.68 pounds per hour. These PM₁₀ emission limits, equivalent to 14.0 tons per year, make 326 IAC 2-2 not applicable.

On May 22, 1998, Richard J. Sullivan, Division Manager at New Venture Gear, submitted comments on the proposed construction permit. The summary of the comments and corresponding responses are as follows:

COMMENT 1:

Operation Condition Number 7 (page 3 of 9) - There is a requirement that all four units to be stack tested for PM and PM₁₀. New Venture Gear does not feel that these stack tests are necessary since the potential emissions before controls is lower than the allowable emission limits. As long as the baghouse dust collectors are in operation, estimated emissions are 0.53 tons per year particulate matter and 0.46 tons per year PM₁₀, which are over an order of magnitude lower than allowable limits and PSD thresholds.

RESPONSE 1:

Stack testing is being required in order to verify the non-standard emission factors of only 0.45 pounds per ton of PM and 0.387 pounds per ton of PM₁₀ from these blasters versus the standard US EPA AP-42 emission factors from shot blasting are 17.0 pounds per ton for PM and 1.7 pounds per ton for PM₁₀. The calculated potential PM emissions before control are less than the allowable emissions under 326 IAC 6-3-2, only if the non-standard emission factors cited in your application are used. The potential PM emissions from the four (4) blasters would be 2,010 tons per year with the AP-42 emission factors, rather than the estimated 53.2 tons per year based on the emission factors cited in the application. According to your consultant, the PM factors cited in the application and used in the potential PM emission calculations were obtained from stack testing of PM from similar blasters. The PM₁₀ factors cited in your application were developed by taking the standard Stappa Alapco ratio of PM₁₀ to PM and are also a function of the stack-test derived PM emission factors. Therefore, no changes in the permit conditions have been made.

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

New Venture Gear, Inc.
P.O. Box 2527
Muncie, IN 47307-2527

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 New Venture Gear, Inc..
(Title) (Company Name)
3. By virtue of my position with New Venture Gear, Inc., I have personal knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of New Venture Gear, Inc..
4. I hereby certify that New Venture Gear, Inc., 1200 West 8th Street, Muncie, Indiana 47307, has constructed the four (4) abrasive blasting units in conformity with the requirements and intent of the Construction Permit application received by the Office of Air Management on April 13, 1998 and as permitted pursuant to **Construction Permit No. 035-9670, Plant ID No. 035-00015** issued on _____.
5. Additional TYPEOFFACILITY were constructed/substituted as described in the attachment to this document and were not made in accordance with the Construction Permit. (Delete this statement if it does not apply.)
6. I hereby certify that New Venture Gear, Inc. has submitted their Part 70 (T-035-7145) application on November 13, 1996 for the existing source. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

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: Emission Calculations

Company Name: New Venture Gear, Inc.
 Address City IN Zip: 1200 West 8th Street, Muncie, IN 47307
 CP: 035-9670
 Plt ID: 035-00015
 Reviewer: Frank P. Castelli
 Date: April 13, 1998

Process	Throughput tons/hr	All Four Units PM Control
Nozzle Shot Peen 225	3.0	99.0%

Stack test (PM) / Stappa Alapco ratio (PM10)	PM	PM10	Allowable PM
Emission Factors lbs/ton shot	0.450	0.387	326 IAC 6-3-2
Percentage of Emissions	100.00%	100.00%	
Potential Emissions lbs/hr	1.35	1.16	8.56
Potential Emissions after controls lbs/hr	0.013	0.012	
Potential Emissions tons/yr	5.91	5.09	
Potential Emissions after Controls tons/yr	0.059	0.051	

Process	Throughput tons/hr
Nozzle Shot Peen 448208-2	3.0

Stack test (PM) / Stappa Alapco ratio (PM10)	PM	PM10	Allowable PM
Emission Factors lbs/ton shot	0.450	0.387	326 IAC 6-3-2
Percentage of Emissions	100.00%	100.00%	
Potential Emissions lbs/hr	1.35	1.16	8.56
Potential Emissions after controls lbs/hr	0.013	0.012	
Potential Emissions tons/yr	5.91	5.09	
Potential Emissions after Controls tons/yr	0.059	0.051	

Process	Throughput tons/hr
Rebuilt Nozzle Shot Peen	3.0

Stack test (PM) / Stappa Alapco ratio (PM10)	PM	PM10	Allowable PM
Emission Factors lbs/ton shot	0.450	0.387	326 IAC 6-3-2
Percentage of Emissions	100.00%	100.00%	
Potential Emissions lbs/hr	1.35	1.16	8.56
Potential Emissions after controls lbs/hr	0.013	0.012	
Potential Emissions tons/yr	5.91	5.09	
Potential Emissions after Controls tons/yr	0.059	0.051	

Process	Throughput tons/hr
Doulbe Wheel Shot Peen 999	18.0

Stack test (PM) / Stappa Alapco ratio (PM10)	PM	PM10	Allowable PM
Emission Factors lbs/ton shot	0.450	0.387	326 IAC 6-3-2
Percentage of Emissions	100.00%	100.00%	
Potential Emissions lbs/hr	8.10	6.97	28.4
Potential Emissions after controls lbs/hr	0.081	0.070	
Potential Emissions tons/yr	35.5	30.5	
Potential Emissions after Controls tons/yr	0.355	0.305	

Allowable PM is calculated with the equation $PM = 4.10 * P^{0.67}$, where P = process weight rate in tons per hour

Total Air Toxics after controls, estimates based upon trace amounts in steel

SUMMARY OF POTENTIAL EMISSIONS

TOTALS (tons per year)	Before Control:	PM	PM10
		53.2	45.8
	After Control:	0.532	0.458

	lbs/hr	tons/yr
Chromium Compounds	0.001	0.004
Manganese Compounds	0.001	0.004
Nickel Compounds	0.001	0.004
Total	0.003	0.013