

MEMORANDUM

TO: Interested Parties / Applicant Certified Mail Z 250 238 304

FROM: Robert F. Holm, PhD. Administrator
City of Indianapolis, Environmental Resources Management Division

DATE: March 8, 1999

SUBJECT: Notice of Decision - **FESOP Approval for Geiger & Peters, Incorporated, Indianapolis F097-9690-00135**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, within fifteen (15) days from the date of receipt of this notice. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing: (1) The date the document is delivered to the Office of Environmental Adjudication (OEA), (2) The date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail. (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and the following: (1) the name and address of the person making the request; (2) the interest of the person making the request; (3) identification of any persons represented by the person making the request; (4) the reasons, with particularity, for the request; (5) the issues, with particularity, proposed for consideration at any hearing; (6) identification of the terms and conditions which, in the judgement of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to IC 4-21.5-3-5(d), the Office of Environmental Adjudication will provide you with notice of any prehearing conferences, preliminary hearing, hearings, stays, or orders disposing of the review of this decision if a written request is submitted to the Office of Environmental Adjudication at the above address. If you have procedural or scheduling questions regarding your petition, you may contact the Office of Environmental Adjudication at 317-232-8591. If you have any other questions regarding the enclosed document, please contact the Office of Air Management (OAM) at 317-233-0178.

Attachment - FESOP

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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

OFFICE OF AIR MANAGEMENT
and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISIONS
AIR QUALITY MANAGEMENT SECTION

Geiger & Peters, Incorporated
761 South Sherman Drive
Indianapolis, Indiana 46203

Geiger & Peters, Incorporated is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

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

Operation Permit No.: F097-9690-00135	
Issued by: Dr. Robert F. Holm, Administrator Environmental Resources Management Division	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and the Indianapolis Environmental Resources Management Division (ERMD). 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 structural metal fabrication operation under a Standard Industrial Classification Code (SIC) of 3441 (establishments primarily engaged in fabricating iron and steel or other metals for structural purposes, such as bridges, buildings, etc.).

Responsible Official: **George Mandis**
Source Address: **761 South Sherman Drive, Indianapolis, Indiana 46203**
Mailing Address: **P.O. Box 33807, Indianapolis, Indiana 46203**
SIC Code: **3441**
County Location: **Marion**
County Status: **Nonattainment for PM**
Source Status: **Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD and Emission Offset Rules**

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) Irvin Industries Horizontal Roller Blast machine identified as Emission Unit ID Horizontal Roller Blast Machine. Model number 100-1m-10. Maximum unit capacity of 3900 pounds of steel shot/grit cycled per hour. Equipped with one (1) reverse flow baghouse for particulate matter control identified as Control Equipment ID CE #1 and exhausting at 8700 acfm at Stack/Vent ID CE # 1. Installation date of 1982.
- (b) One (1) Graco Spray Painting Operation utilizing two (2) airless spray painting guns identified as Emission Unit ID Spray Painting. Fabricated steel beams and other miscellaneous metal parts are spray painted inside the manufacturing building and are not directly exhausted to any control equipment or Stack/Vent ID. Maximum rated capacity to apply coatings is 1.0 gallon of coating per unit and 1.5 units per hour. Emission Unit ID Spray Painting includes the use of miscellaneous solvents used both as thinner and cleanup. Installation date of 1905.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal or less than ten (10) million Btu per hour,
- (2) Machining where an aqueous cutting coolant continuously floods the machining surface,
- (3) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment,

- (4) Any of the following structural steel and bridge fabrication activities: Cutting 200,000 linear feet or less of one (1) inch plate or equivalent and/or using eighty (80) tons or less of welding consumables,
- (5) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment,
- (6) Paved and unpaved roads and parking lots with public access,
- (7) Other activities not previously identified (by category) with emissions equal to or less than Insignificant Activity thresholds: drilling holes, saw cutting, shearing, flame cutting and/or punching steel beams and plates.

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) and the Indianapolis Environmental Resources Management Division (ERMD) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

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

SECTION B GENERAL CONDITIONS

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

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

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

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

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

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

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

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

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

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

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

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

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

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

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

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) The Permittee shall furnish to IDEM, OAM, and ERMD within a reasonable time, any information that IDEM, OAM, and ERMD may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and ERMD copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, and ERMD along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

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

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

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

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

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

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

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, and ERMD may require to determine the compliance status of the source.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

and

Environmental Resources Management Division
Air Quality Management Section, Data Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM and ERMD, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM, OAM

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

ERMD

Telephone No.: 317-327-2234

Facsimile No.: 317-327-2274

Failure to notify IDEM, OAM and ERMD, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

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

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM and ERMD, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM and ERMD, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B.14 - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM and ERMD determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

- (c) Proceedings by IDEM, OAM and ERMD, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM and ERMD, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM and ERMD, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and ERMD and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

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

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM and ERMD upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM and ERMD takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM and ERMD, any additional information identified as needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

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

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

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

B.20 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

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

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

B.21 Operational Flexibility [326 IAC 2-8-15]

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

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

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

and

Environmental Resources Management Division
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM and ERMD, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;

- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

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

- (c) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM and ERMD, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

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

B.24 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and ERMD, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM and ERMD shall reserve the right to issue a new permit.

B.25 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, and ERMD, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per rolling twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per rolling twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per rolling twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 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%) opacity in any one (1) six (6) minute averaging period as determined by 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) in a six (6) hour period.

This condition is not federally enforceable.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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

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

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

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment is /are in operation.

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

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

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

and

Environmental Resources Management Division
Enforcement Section, Asbestos Program
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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

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

Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

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

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

- (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

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

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 and ERMD 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 and ERMD, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

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

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

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

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

C.11 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.12 Monitoring Methods [326 IAC 3]

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

C.13 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.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

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

- (a) Submit:
- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, and ERMD that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, and ERMD that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Response Steps [326 IAC 2-8-4][326 IAC 2-8-5][326 IAC 1-6] [326 IAC 2-8-4(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and ERMD upon request and shall be subject to review and approval by IDEM, OAM, and ERMD. 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.16 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.8 - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

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

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

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). 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

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.

C.18 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C.8-Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and ERMD may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM and ERMD representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or ERMD makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or ERMD within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;

- (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C.14 - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

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

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

and

Environmental Resources Management Division
Air Quality Management Section, Compliance Data
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and ERMD on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B.15-Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

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

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Emission Unit ID Horizontal Roller Blast Machine	Facility Description [326 IAC 2-8-4(10)] One (1) Irvin Industries Horizontal Roller Blast machine identified as Emission Unit ID Horizontal Roller Blast Machine. Model number 100-1m-10. Maximum unit capacity of 3900 pounds of steel shot/grit cycled per hour. Equipped with one (1) reverse flow baghouse for particulate matter control identified as Control Equipment ID CE #1 and exhausting at 8700 acfm at Stack/Vent ID CE # 1. Installation date of 1982.
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Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) Nonattainment Area Particulate Limitations: Specified, PM emissions from Emission Unit ID Horizontal Roller Blast Machine shall not exceed 0.03 gr/dscf.

D.1.2 Particulate Matter Ten (10) Microns or Less (PM10) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 Federally Enforceable Permit Program, PM10 emissions from Emission Unit ID Horizontal Roller Blast Machine shall not exceed 0.03 gr/dscf.

Limiting PM10 emissions to less than 0.03 gr/dscf is equivalent to less than 2.2 pounds per hour of PM10 emissions. Compliance with the PM10 limitations of Section D.1.2, D.2.2, and all Insignificant Activities limit source wide PM10 emissions to less than the major source threshold. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID Horizontal Roller Blast Machine.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(1)]

The Permittee is not required to test Emission Unit ID Horizontal Roller Blast Machine by this permit. However, IDEM and/or ERMD may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.1.1 or with the PM10 limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C.9 - Performance Testing.

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

D.1.5 Particulate Matter (PM)

The control equipment for PM for Emission Unit ID Horizontal Roller Blast Machine, identified as CE # 1, shall be in operation at all times when Emission Unit Horizontal Roller Blast Machine is in operation.

D.1.6 Daily Visible Emission Notations

- (a) Daily visible emission notations of the Emission Unit ID Horizontal Roller Blast Machine stack exhaust(s) shall be performed during normal daylight operations when the blasting machine is in operation. 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.1.7 Parametric Monitoring - Pressure Readings

The Permittee shall record the total static pressure drop across the baghouse controlling the blasting machine, identified as Control Equipment ID CE #1, at least once daily when the blasting machine is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 to 6.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. 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.14 - Emergency Provisions).
- (b) For single compartment baghouses, 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.14 - Emergency Provisions).

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of daily visible emission notations of Emission Unit ID Horizontal Roller Blast Machine stack exhaust when the blasting machine is in operation.

- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of daily pressure readings of Control Equipment ID CE # 1 when the blasting machine is in operation.

SECTION D.2 FACILITY OPERATION CONDITIONS

Emission Unit ID Spray Painting	Facility Description [326 IAC 2-8-4(10)] One (1) Graco Spray Painting Operation utilizing two (2) airless spray painting guns identified as Emission Unit ID Spray Painting. Fabricated steel beams and other miscellaneous metal parts are spray painted inside the manufacturing building and are not directly exhausted to any control equipment or Stack/Vent ID. Maximum rated capacity to apply coatings is 1.0 gallon of coating per unit and 1.5 units per hour. Emission Unit ID Spray Painting includes the use of miscellaneous solvents used both as thinner and cleanup. Installation date of 1905.
--	--

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

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) Nonattainment Area Particulate Limitations: Specified, PM emissions from Emission Unit ID Spray Painting, should emissions be directed to the outside air, shall not exceed 0.03 gr/dscf.

D.2.2 Particulate Matter Ten (10) Microns or Less (PM10) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 Federally Enforceable Permit Program, PM10 emissions from Emission Unit ID Spray Painting, should emissions be directed to the outside air, shall not exceed 0.03 gr/dscf.

Limiting PM10 emissions to less than 0.03 gr/dscf is equivalent to less than 3.4 pounds of PM10 emissions per hour. Compliance with the PM10 limitations of Section D.1.2, D.2.2, and all Insignificant Activities limit source wide PM10 emissions to less than the major source threshold. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.2.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

The hazardous air pollutant emissions shall be limited as follows:

- (a) A single hazardous air pollutant (HAP) delivered to the applicator shall not exceed nine (9.0) tons per rolling twelve (12) consecutive month period.
- (b) Any combination of HAPs delivered to the applicator shall not exceed twenty-four (24.0) tons per rolling twelve (12) consecutive month period.

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

D.2.4 Volatile Organic Compounds (VOCs) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings as applied to miscellaneous metal parts, including maintenance spray painting of production equipment, shall be limited to 3.5 pounds of VOCs per gallon of coating less water for air dried or forced warm air dried coatings.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up 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 manner that evaporation is minimized.

D.2.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.2.6 Testing Requirements [326 IAC 2-8-5(1)]

The Permittee is not required to test Emission Unit ID Spray Painting by this permit. However, IDEM and/or ERMD may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.2.1 or with the PM10 limit specified in Condition D.2.2 shall be determined by a performance test conducted in accordance with Section C.9 - Performance Testing.

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

D.2.7 Monitoring

Should over spray emissions from Emission Unit ID Spray Painting be directed to the outside air:

- (a) Weekly observations shall be made of the over spray from surface coating stack exhaust while surface coating 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.15 - 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 over spray on the rooftops and/or the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in over spray emission, or evidence of over spray 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.15 - 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.2.8 Volatile Organic Compound (VOC) Content and Usage

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.2.4.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;

- (3) The VOC content of the coatings used, as applied, for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.7, the Permittee shall maintain a log of weekly over spray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C.19 - General Record Keeping Requirements, of this permit.

D.2.9 Hazardous Air Pollutants (HAPs)

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP(s) emission limit(s) established in Condition D.2.3.
- (1) The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use;
 - (3) The HAP content (weight percent) of each material used;
 - (4) The weight of HAPs emitted for each calendar month, considering capture and control efficiency, if applicable;
 - (5) Identification of the facility or facilities associated with the usage of each HAP.
- (b) All records shall be maintained in accordance with Section C.19 - General Record Keeping Requirements, of this permit.

D.2.10 Reporting Requirements

A quarterly summary to document compliance with operation condition number D.2.3 Hazardous Air Pollutants shall be submitted to the address(es) listed in Section C.20 - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

Insignificant Activities

Fabrication of steel and miscellaneous metal parts including mechanical drilling, saw cutting, flame cutting, punching, brazing, soldering and flux cored arc welding.

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

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) Nonattainment Area Particulate Limitations: Specified, PM emissions from insignificant activities shall not exceed 0.03 gr/dscf.

D.3.2 Particulate Matter less than Ten Microns (PM10) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 Federally Enforceable Permit Program, PM10 emissions from insignificant activities shall not exceed 0.03 gr/dscf.

Compliance Determination Requirement

D.3.3 Testing Requirements [326 IAC 2-8-5(1)]

The Permittee is not required to test insignificant activities by this permit. However, IDEM and/or ERMD may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C.9 - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION and
INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Geiger & Peters, Incorporated
Source Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
Mailing Address: P.O. Box 33807, Indianapolis, Indiana 46203
FESOP No.: F097-9690-00135

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

and

**INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

2700 S. Belmont Ave.
Indianapolis Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274

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

Source Name: Geiger & Peters, Incorporated
Source Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
Mailing Address: P.O. Box 33807, Indianapolis, Indiana 46203
Part 70 Permit No.: F097-9690-00135

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

9 1. This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the ERMD and OAM, within four (4) business hours; and
CThe Permittee must submit notice in writing or by facsimile to ERMD and OAM within two (2) days, and follow the other requirements of 326 IAC 2-8-12

9 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C)
CThe Permittee must submit notice in writing within ten (10) calendar days

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
 AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

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

Source Name: Geiger & Peters, Incorporated
 Source Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
 FESOP No.: F097-9690-00135
 Facility: Emission Unit ID Spray Painting
 Parameter: Monthly rolling HAP Emissions
 Limit: 9.0 tons single HAP per rolling 12 consecutive month period and 24.0 tons of any combination of HAPs emissions per rolling 12 consecutive month period.

Quarter _____ Year _____

Highest Single HAP Emissions in Tons per Rolling 12 Consecutive Month Period

Month #	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month			
Month			
Month			

Any Combination Sum of HAPs Emissions per Rolling 12 Consecutive Month Period

Month #	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month			
Month			
Month			

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

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION
 AIR QUALITY MANAGEMENT SECTION, COMPLIANCE DATA**

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

Source Name: Geiger & Peters, Incorporated
 Source Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
 Mailing Address: P.O. Box 33807, Indianapolis, Indiana 46203
 FESOP No.: F097-9690-00135

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

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

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations

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

Attach a signed certification to complete this report.

Environmental Resources Management Division Air Quality Management Section

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

Source Background And Description

Source Name:	Geiger & Peters, Incorporated
Source Location:	761 South Sherman Drive, Indianapolis, Indiana 46203
County:	Marion
SIC Code:	3441
Operation Permit No.:	F097-9690-00135
Permit Reviewer:	M. Caraher

The Environmental Resource Management Division (ERMD), Air Quality Management Section has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Geiger & Peters, Incorporated relating to a structural metal fabrication operation under a Standard Industrial Classification Code (SIC) of 3441 (establishments primarily engaged in the fabrication of iron and steel or other metal products for structural purposes such as bridges, buildings, etc.).

Permitted Emission Units and Pollution Control Equipment

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

- (a) Facility Description [326 IAC 2-8-4(10)] One (1) Irvin Industries Horizontal Roller Blast machine identified as Emission Unit ID Horizontal Roller Blast Machine. Model number 100-1m-10. Maximum unit capacity of 3900 pounds of steel shot/grit cycled per hour. Equipped with one (1) reverse flow baghouse for particulate matter control identified as Control Equipment ID CE #1 and exhausting at 8700 acfm at Stack/Vent ID CE # 1. Installation date of 1982.
- (b) Facility Description [326 IAC 2-8-4(10)] One (1) Graco Spray Painting Operation utilizing two (2) airless spray painting guns identified as Emission Unit ID Spray Painting. Fabricated steel beams and other miscellaneous metal parts are spray painted inside the manufacturing building and are not directly exhausted to any control equipment or Stack/Vent ID. Maximum rated capacity to apply coatings is 1.0 gallon of coating per unit and 1.5 units per hour. Emission Unit ID Spray Painting includes the use of miscellaneous solvents used both as thinner and cleanup. Installation date of 1905.

Unpermitted Emission Units and Pollution Control Equipment

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

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

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

Insignificant Activities

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

- (1) Natural gas-fired combustion sources with heat input equal or less than ten (10) million Btu per hour,
- (2) Machining where an aqueous cutting coolant continuously floods the machining surface,
- (3) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment,
- (4) Any of the following structural steel and bridge fabrication activities: Cutting 200,000 linear feet or less of one (1) inch plate or equivalent and/or using eighty (80) tons or less of welding consumables,
- (5) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment,
- (6) Paved and unpaved roads and parking lots with public access,
- (7) Other activities not previously identified (by category) with emissions equal to or less than Insignificant Activity thresholds: drilling holes, saw cutting, shearing, flame cutting and/or punching steel beams and plates.

Existing Approvals

This source has been operating under the following approvals:

- (1) Certificate of Operation Number 0135-01, issued on July 26, 1989 for one (1) "Horizontal roller conveyor blast cleaning machine manufactured by Irvin Industries."
- (2) Certificate of Operation Number 0135-02, issued on July 26, 1989 for three (3) "Graco airless spray painting guns."

Enforcement Issue

This source is an existing source who has been operating with Certificates of Operation issued under 326 IAC 2-1-4 (State Construction and Operating Permits: Operating Permits) for the significant facilities. 326 IAC 2-7-4 requires existing sources with PTE of regulated pollutant(s) above any major source threshold to submit a Part 70 Permit Program application within twelve (12) months of the approval date by USEPA of Indiana's Part 70 Permit Program. Existing major sources were to have on file a complete FESOP/Title V application no later than December 13, 1996. IDEM and ERMD are aware that a Title V application, with a request to be a FESOP source, was not filed by the source until March 16, 1998 and will take the appropriate action.

There are no Enforcement actions pending.

Recommendation

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

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

An administratively complete FESOP application for the purposes of this review was received on March 16, 1998. Additional information was received on October 26, 1998.

Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations (pages 1 through 4 of 4).

Potential Emissions

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

(For each pollutant below list the total Potential Emissions from all facilities added together)

Pollutant	Potential Emissions (tons/year)
PM	197.4
PM-10	144.3
SO ₂	0.0
VOC	67.4
CO	0.0
NO _x	0.0

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

See attached spreadsheets for detailed calculations (TSD Appendix A pages 1 through 4 of 4).

HAP	Potential Emissions (tons/year)
xylene	47.6
dimethylbenzene (m, o or p xylene)	7.5
methyl isobutyl ketone	11.4
TOTAL	66.5

See attached spreadsheets for detailed calculations (TSD Appendix A pages 1 through 4 of 4).

- (a) The potential emissions (as defined in the Indiana Rule) of particulate matter less than ten (10) microns (PM10) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

(d) Fugitive Emissions

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

Limited Potential To Emit

(a) The source has accepted a federally enforceable limit on potential to emit PM10 of 99.0 tons per year, consisting of:

- (i) 99.0 tons per year for the significant activities less the insignificant activities; and
- (ii) 5.6 tons per year for the insignificant activities.

(b) The source has accepted a limit on potential to emit of 9.0 tons per year for any single HAP and 24.0 tons per year for any combination of HAPs.

(c) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

	Limited Potential to Emit (tons/year)						
Process/ facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Emission Unit ID Horizontal Roller Blast Machine	See below *	See below *	0.0	0.0	0.0	0.0	0.0
Emission Unit ID Spray Painting	See below *	See below *	0.0	67.4	0.0	0.0	9.0 / 24.0
Insignificant Activities	5.6	5.6	0.0	0.0	0.0	0.0	0.0
Total Emissions	See below *	< 99.0	0.0	67.4	0.0	0.0	9.0 / 24.0

* denotes significant facilities + insignificant activities are limited to less than the major source threshold for PM10.

County Attainment Status

The source is located in Marion County.

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

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

Federal Rule Applicability

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

State Rule Applicability - Entire Source

326 IAC 1-6 Malfunctions and 326 IAC 2-8-12

The source is initially subject to 326 IAC 1-6 because it is required to obtain a permit under 326 IAC 2 Permit Review Rules. However, 326 IAC 1-6 emergency or upset provisions are superseded by 326 IAC 2-8-12 which requires the source to report verbally within four (4) business hours any emergency which results in an increase of an emission limitation or violation of an applicable rule. A written excess emissions report is required to be submitted within two (2) working days of any such occurrence. Records of all such occurrences are to be retained at the source for a period of three (3) years from the date of such occurrence(s) and shall be made available to IDEM, OAM and/or ERMD upon request.

326 IAC 1-6-3 Malfunctions: Preventive Maintenance (PM) Plans and 326 IAC 2-8-3

Any person responsible for operating any facility specified in 326 IAC 1-6 shall prepare and maintain a Preventive Maintenance Plan which includes the following information:

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

PM Plans shall be submitted to IDEM, OAM and/or ERMD upon request and shall be subject to review and approval by IDEM, OAM and/or ERMD.

326 IAC 1-7 Stack Height Provisions

All sources having exhaust gas stacks through which a potential of twenty-five (25) tons per year or more of particulate matter (PM) are emitted and for which construction commenced after June 19, 1979 shall be constructed using good engineering practice (GEP) stack height. Emission Unit ID Horizontal Roller Blast Machine has uncontrolled potential to emit PM in excess of 25.0 tons per year (see Appendix A Page 2 of 4). With the use of a baghouse at an estimated 98% PM control efficiency, actual emissions at maximum capacity and 8760 hours of operation are less than 25.0 tons per year. 326 IAC 1-7-5 specifically exempts sources from the GEP stack height requirement if actual emissions (after controls) are less than 25 tons per year.

326 IAC 2-1 (Permit Review Rules)

This source is subject to 326 IAC 2 (Permit Review Rules) because 326 IAC 2-1-1(b)(1)(A) states sources or facilities with allowable emissions of 25.0 tons per year of any regulated pollutant shall complete a permit application and be permitted. The source has been operating at this location for a number of years and has previous air emission permits issued to it because potential and/or allowable PM and VOC emissions exceed 25 tons per year. In addition, 326 IAC 2-1-1(b)(1)(G) states sources or facilities with allowable emissions of any single hazardous air pollutant (HAP) in excess of 10 tons per year and sources or facilities with any combination of allowable HAP in excess of 25 tons per year shall complete a permit application and be permitted. With the filing of a FESOP application on March 16, 1998, the source has stated that potential and/or allowable HAP emissions exceed 10 tons per year of any single HAP and exceed 25 tons per year of any combination of HAP. The source has applied for a FESOP under 326 IAC 2-8 (FESOP)

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it emits more than ten (10) tons per year of Volatile Organic Compounds (VOC) in Marion. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

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

This source, with the filing of a FESOP application March 16, 1998, has stated that the potential to emit PM₁₀ and HAPs is in excess of the major source threshold(s) but has actual emissions less than the major source threshold(s). Therefore, Geiger & Peters, Incorporated wishes to obtain a FESOP under 326 IAC 2-8 to enforceably restrict its potential to emit to less than the major source threshold(s).

326 IAC 5-1 (Visible Emissions Limitations)

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

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

Emission Unit ID Horizontal Roller Blast Machine

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

9.8 tons per year and 0.03 gr/dscf are previously existing Certificate of Operation No. 0135-01 limits for PM. 0.03 gr/dscf is an applicable short term limit for PM from 326 IAC 6-1-2. At a rated exhaust air flow rate of 8700 acfm, 0.03 gr/dscf equates to 9.8 tons per year. PTE PM10 from this Emission Unit exceeds 100 tons per year (see TSD Appendix A page 2 of 4). Calculated actual controlled PM/PM10 emissions equate to 0.011 gr/dscf (see TSD Appendix A page 2 of 3). For the basis of this review and determination and pursuant to 326 IAC 2-8 (Federally Enforceable State Operating Permit Program (FESOP)), PM10 emissions are limited to 0.03 gr/dscf. Therefore, PTE is enforceably restricted to less than the major source threshold such that the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.

326 IAC 6-1-2 (Nonattainment Area Particulate Limitations: Specified)

Potential to emit PM from this facility exceeds 100 tons per year (see TSD Appendix A page 2 of 4). Certificate of Operation 0135-01 reissued July 26, 1989 contained the applicable 0.03 gr/dscf limit for this Emission Unit ID and was extrapolated to 9.8 tons of PM as an allowable long term PM limit. Calculated actual controlled PM/PM10 emissions equate to 0.011 gr/dscf (see TSD Appendix A page 2 of 3). Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations: Specified), particulate matter (PM) emissions from Emission Unit ID Horizontal Roller Blast Machine are limited to 0.03 gr/dscf.

Emission Unit ID Spray Painting

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

PTE to emit any single HAP or any combination of HAP exceeds the major source thresholds for HAPs. Actual HAP emissions are reported, per the FESOP application, to be less than the major source thresholds. Pursuant to 326 IAC 2-8 (Federally Enforceable State Operating Permit Program (FESOP)), any single HAP emissions are limited to 9.0 tons per rolling twelve (12) consecutive month period and combined HAPs emissions are limited to 24.0 tons per rolling twelve (12) consecutive month period. Therefore, PTE is enforceably restricted to less than the major source threshold and the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.

326 IAC 6-1-2 (Nonattainment Area Particulate Limitations: Specified)

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations: Specified), particulate matter (PM) emissions from Emission Unit ID Spray Painting are limited to 0.03 gr/dscf should emissions be redirected to the outside air. Presently, the source does not apply coatings in a spray booth with exhaust and does not directly or indirectly vent this process to the outside air. Under a Standard Industrial Classification Code of 3441, large structural beams, supports, etc. are painted at this source. The source claims the size of the miscellaneous metal parts painted at this facility are too large to fit in a conventional spray booth and the air handling requirements and expense for a booth

designed to hold any size beam or support painted at this facility would be cost prohibitive.

For the basis of this review and determination, spray painting PTE PM10 is equal to spray painting PTE to emit PM. There is no collection system for over spray nor is there any direct or indirect exhaust to the outside air from spray painting. At surface coating maximum capacity and at an estimated 80 % transfer efficiency of coating solids (see TSD Appendix A page 1 of 4), and to the extent quantifiable, a resulting material balance estimates 14.8 tons per year of PM/PM10 over spray.

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

This source has an SIC of 34 and surface coats miscellaneous metal parts in Marion County. The CD-01 Form in the FESOP application indicates that 326 IAC 8-2-9 is an applicable requirement because actual VOC emissions exceed fifteen (15) pounds per day. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating(s) applied in Emission Unit ID Spray Painting shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried or forced warm air dried coatings up to 194 degrees Fahrenheit. The facility is not presently equipped with a drying oven or drying equipment and all coatings are air dried.

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

Based on the MSDS submitted by the company and calculations made (see TSD Appendix A page 1 of 4), spray painting operations appear to be in compliance with this requirement.

Compliance Requirements

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

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

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

Emission Unit ID Horizontal Roller Blast Machine has applicable compliance monitoring conditions as specified below:

The control equipment for PM for Emission Unit ID Horizontal Roller Blast Machine, identified as CE # 1, shall be in operation at all times when Emission Unit Horizontal Roller Blast Machine is in operation.

- (a) Daily visible emission notations of the Emission Unit ID Horizontal Roller Blast Machine stack exhaust(s) shall be performed during normal daylight operations when the blasting machine is in operation. 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.

The Permittee shall record the total static pressure drop across the baghouse controlling the blasting machine, identified as Control Equipment ID CE #1, at least once daily when the blasting machine is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 to 6.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

In the event that bag failure has been observed.

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. 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.14 - Emergency Provisions).
- (b) For single compartment baghouses, 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.14 - Emergency Provisions).

These monitoring conditions are necessary because the baghouse for the blasting machine must operate properly to ensure compliance with 326 IAC 6-1-2 (Process Operations) and 326 IAC 2-8 (FESOP).

Emission Unit ID Spray Painting has applicable compliance monitoring conditions as specified below:

Should over spray emissions from Emission Unit ID Spray Painting be directed to the outside air:

- (a) Weekly observations shall be made of the over spray from surface coating stack exhaust while surface coating 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.15 - 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 over spray on the rooftops and/or the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in over spray emission, or evidence of over spray 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.15 - 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.

These monitoring conditions are necessary because the spray painting operation must ensure compliance with 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations: Specified) and 326 IAC 2-8 (FESOP).

Air Toxic Emissions

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

- (a) This source has accepted federally enforceable air toxic emission limits of 9.0 tons per year for any single HAP and/or 24 tons per year for any combination of HAPs.

Conclusion

The operation of this structural metal fabrication operation will be subject to the conditions of the attached proposed FESOP No. F097-9690-00135.

APPENDIX A

Appendix A: Emission Calculations
Spray Painting PTE (as supplied)

Max capacity stated as:	1 gallon per unit (ton)
	1.5 units (tons) / hr
	1.5 gallon cleanup use/hr
	80 % Transfer Efficiency

Company Name: Geiger & Peters, Inc.
Address, City, ZIP: 761 South Sherman Drive, Indianapolis, Indiana 46203
CP:
Pit ID: F097-9690-00135
Reviewer: M. Caraher
Date: 10/26/98

Highest VOC content(s)

Coating	lbs coat/galcoat	wt % solids	lbs solids/gal solids	wt % volatiles	lbs volatiles/gal coat	VOC density lbs VOC/gal VOC	wt % water	lbs VOC/gal coat less water	lbs VOC/gal solids	lbs/hr VOC PTE	tons/yr VOC PTE	@ Transfer Eff. PM tons/yr
Tnemec 1009	11.7	75.0	8.8	25.0	2.9	7.36	0.0	2.9	4.9	4.4	19.2	11.5
Tnemec FD88	12.8	78.4	10.0	21.6	2.8	7.36	0.0	2.8	4.4	4.1	18.1	13.2
Tnemec 161 Convertor	10.7	72.5	7.7	27.5	2.9	7.36	0.0	2.9	4.9	4.4	19.3	10.2
Tnemec 161-AA07A * (* *)	14.3	78.9	11.3	21.1	3.0	7.36	0.0	3.0	5.1	4.5	19.8	14.8
International 260	12.3	79.6	9.8	20.4	2.5	7.36	0.0	2.5	3.8	3.8	16.4	12.8
International 670	12.2	77.9	9.5	22.1	2.7	7.36	0.0	2.7	4.2	4.0	17.7	12.4
Xylene (Cleanup)***	7.3	0.0	0.0	100.0	7.3	7.25	0.0	7.3	NA	10.9	47.6	NA
MEK (Cleanup)	6.8	0.0	0.0	100.0	6.8	6.75	0.0	6.8	NA	10.1	44.3	NA
Sum of VOC & Cleanup										15.4	67.4	

wt % solids = 100 - (wt % VOC + wt % water)
lbs solids/gal solids = lbs coat/gal coat x wt % solids/100
wt % volatiles = as reported by MSDS
lbs volatiles/gal coat = lbs coat/gal coat x wt % volatiles
VOC density/lbs VOC/gal VOC = 7.36 per USEPA as an average if a VOC mix
lbs VOC/gal coat = lbs coat/gal coat x wt % H2O = lb H2O/gal coat
less H2O = lb H2O/gal coat x 1/8.33 lb H2O/gal H2O = gal H2O/gal coat
lb volatiles/gal coat / (1gal - gal H2O)/ gal coat = lbs VOC/gal coat less H2O
lbs VOC/gal solids = lbs coat/gal coat x wt % volatiles x gal coat/1 - (lbs VOC/gal coat x gal VOC/lbs VOC)
lbs/hr VOC PTE = lbs coat/gal coat x gal/hr x wt % VOC/100
VOC ton/yr PTE = lbs VOC/hr x 8760/2000
Transfer Efficiency = #s solids deposited/#s solids used; % listed is from Air Pollution Engineering Manual AWMA p. 361

* = highest VOC content coating
** = highest PM/PM10 emitting coating
*** = highest VOC from cleanup per hour or year

Highest HAP content(s)

Coating	wt % lbs coat/gal coat	wt % Ethylbenzene	wt % Dimethylbenzene	wt % MEK	wt % MIK	wt % xylene	Highest wt % Single HAP	Highest ton/yr Single HAP PTE	Highest wt % Combined HAPs	Highest ton/yr Combined HAPs PTE
Tnemec 1009	11.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Tnemec FD88	12.8	2.8	11.9	2.3	0.0	0.0	11.9	10.0	17.0	14.3
Tnemec 161 Convertor *	10.7	0.0	10.7	0.0	16.2	0.0	16.2	11.4	26.9	18.9
Tnemec 161-AA07A	14.3	2.2	5.3	0.0	0.0	0.0	5.3	5.0	7.5	7.0
International 260	12.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
International 670	12.2	0.0	0.0	0.0	0.0	2.1	2.1	1.6	2.1	1.6
Xylene (Cleanup) **	7.3	0.0	0.0	0.0	0.0	100.0	100.0	47.6	100.0	47.6
MEK (Cleanup)	6.8	0.0	0.0	100.0	0.0	0.0	100.0	44.3	100.0	44.3
Highest paint/cleanup & sum of paint + cleanup							47.6			66.5

wt % HAPs = as reported per MSDS

* = highest HAP content coating
** = highest cleanup HAP content

Appendix A: Emission Calculations
Abrasive Blasting - Horizontal Roller Blast Machine

Company Name: Geiger & Peters, Inc.
Address City IN Zip: 761 South Sherman Drive, Indianapolis, Indiana 46203
CP:
Plt ID: F097-9690-00135
Reviewer: M. Caraher
Date: 10/26/98

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	180
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)
 FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =
 D = Density of abrasive (lb/ft3) From Table 2 =
 D1 = Density of sand (lb/ft3) =
 ID = Actual nozzle internal diameter (in) =
 ID1 = Nozzle internal diameter (in) from Table 3 =

NA

Flow Rate (FR) (lb/hr) = 3900.0 * per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/lb abrasive) From Application of 3/16/98 * =
 FR = Flow Rate (lb/hr) From Application of 3/16/98 * =
 w = fraction of time of wet blasting =
 N = number of nozzles =
 EF = emission factor (lb PM 10/lb abrasive) From Table 1 for Grit =

0.01036
3900.000
0
1
0.70000

Uncontrolled PM Emissions = 40.4 lb/hr
177.0 ton/yr

Uncontrolled PM 10 Emissions = 28.3 lb/hr
123.9 ton/yr

Estimated Actual Emissions based on 98 % reported baghouse efficiency: 8700 acfm:

METHODOLOGY

Controlled PM Emissions = 0.6 lb/hr **0.011 gr/dscf**
3.5 ton/yr

Emission Factors from Stappa Alapco, Section 3 "Abrasive Blasting"

Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs

Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1)

E = EF x FR x (1-w/200) x N

w should be entered in as a whole number (if w is 50%, enter 50)

Controlled PM 10 Emissions = 0.6 lb/hr **2.2 lb/hr**
2.5 ton/yr **9.8 tons/yr**

* denotes source supplied the flow rate of steel shot/grit in the application received 3/16/98. Source also reported inlet dust concentration of 4714 grains/min. 4714 grains/min * lb/7000 grains x 60 min/hr = 40.4 lbs/hr of emissions uncontrolled. 40.4 lbs/hr / 3900 lbs shot cycled/hr = 0.01036 lbs PM emissions per pound of shot which is in line with Table 1 data.

**Appendix A: Emission Calculations
Potential to Emit & Actual Emissions Summary**

Company Name:	Geiger & Peters, Inc.
Address City IN Zip:	761 South Sherman Drive, Indianapolis, Indiana 46203
CP:	
Plt ID:	F097-9690-00135
Reviewer:	M. Caraher
Date:	10/26/98

Potential to Emit

	PM		PM10		VOC		Highest Single HAP		Combined HAP	
	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr
Horizontal Roller Blast Machine	969.9	177.0	678.9	123.9	0.0	0.0	0.0	0.0	0.0	0.0
Spray Painting Operation	81.1	14.8	81.1	14.8	369.3	67.4	260.8	47.6	364.4	66.5
Insignificant Activities		5.6		5.6	0.0	0.0	0.0	0.0	0.0	0.0
Sum	1051.0	197.4	760.0	144.3	369.3	67.4	260.8	47.6	364.4	66.5

Reported Actual per GSD-07, GSD-08 and GSD 10(a)

	PM	PM	PM10	PM10	VOC	VOC	Highest Single	HAP	Combined	HAP
	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr
Horizontal Roller Blast Machine	NR	NR	NR	0.5	NR	NR	NR	0.0	0.0	0.0
Spray Painting Operation	NR	0.0	NR	0.0	NR	25.6	NR	4.0	NR	7.9
Insignificant Activities	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Sum	0.0	0.0	0.0	0.5	0.0	25.6	0.0	4.0	0.0	7.9

NR = not reported

**Appendix A: Emission Calculations
Insignificant Activities PTE**

max tons/yr of welding consumables: 80

Company Name:	Geiger & Peters, Inc.
Address City IN Zip:	761 South Sherman Drive, Indianapolis, Indiana 46203
CP:	
Plt ID:	F097-9690-00135
Reviewer:	M. Caraher
Date:	12/01/98

Insignificant Activity	PTE		Actual	
	PM tons/yr	PM10 tons/yr	PM tons/yr	PM10 tons/yr
Mechanical Drilling Beams & Plates	*	*	NR	NR
Saw Cutting Beams & Plates	*	*	NR	NR
Flame Cutting Beams & Plates	*	*	NR	NR
Punching Beams & Plates	*	*	NR	NR
Brazing	*	*	NR	NR
Soldering	*	*	NR	NR
Flux Cored Arc Welding using Argon (using 80 tons or less of welding consumables)	*	*	NR	NR
SUM	*	*	*	*

* = source certified on application that all insignificant activities combined are less than 5 lbs PM/PM10 per hour and 25 lbs PM/PM10 per day.

25 lbs PM/day * 365/2000 = 4.6 tons per year

NR = Not Reported

AP-42 emfac Table 12.19-1 for FCAW is, worst case, 57 lbs PM10/1000 lbs of welding consumables:

80 tons/yr * 2000 lbs/ton * 57 lbs PM10/1000 lbs * ton/2000 lbs = 4.56 tons PM10/yr