

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

Padgett, Inc.
901 E. Fourth Street
New Albany, Indiana 47151

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

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

Operation Permit No.: F043-9832-00049	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a metal fabrication operation.

Responsible Official: R. J. Padgett
Source Address: 901 E. Fourth Street, New Albany, Indiana 47151
Mailing Address: P.O. Box 1375, New Albany, Indiana 47151-1375
SIC Code: 3441
County Location: Floyd
County Status: Attainment for NO_x, PM₁₀, TSP, CO and SO₂
Moderate Nonattainment for VOC

Source Status: Federally Enforceable State Operating Permit (FESOP)
Minor Source, under PSD and Emission Offset Rules;
Minor Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) paint booth, with one (1) airless gun, designated as EU-01, with a maximum metal input capacity of 3600 lb/hr, controlled by dry filters and exhausts to stacks designated as S/V 01 A & B.
- (b) One (1) paint booth, designated as EU-05, with one (1) airless gun, with a maximum miscellaneous metal input capacity of 3600 lb/hr and exhausts to stacks designated as S/V 03, 04, 05.
- (c) One (1) sand abrasive booth, constructed in 1986, utilized for cleaning metal parts before fabrication and painting, with an abrasive flow rate of 625 lb/hr, controlled by a water settling container and exhausts to a stack designated as S/V 02.
- (d) One (1) mechanical blast unit, with a blast flow rate of 107, 500 lb/hr, controlled by a dust collector and exhausts inside the building.

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

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

- (a) Twenty-Five (25) MIG welding stations, with a total maximum wire consumption rate of 10.31 lb/hr and exhausts to the general ventilation system of the building.

- (b) One (1) TIG welding station, with a total maximum wire consumption rate of 0.33lb/hr and exhausts to the general ventilation system of the building.
- (c) Six (6) stick welding stations, with a total maximum wire consumption rate of 0.08 lb/hr and exhausts to the general ventilation system of the building.
- (d) One (1) flame cutting plasma table, with a maximum metal thickness cut of 5.0 inches, a maximum metal cutting rate of 6.0 in/min and exhausts to the general ventilation system of the building.
- (e) Fourteen (14) radiant heaters, with a maximum heat input capacity of 0.15 mmBtu/hr each. Six (6) radiant heaters are used in the paint booth and eight (8) radiant heaters are used in the main shop and exhausts inside the building.
- (f) Thirteen (13) Oxyacetylene flame-cutting stations, constructed in 1986, with a maximum metal thickness cut of 0.5 inches, a maximum metal cutting rate of 1.2 in/min and exhausts to the general ventilation system of the building.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification 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 April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days (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:

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

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

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

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

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

Facsimile No.: 317-233-5967.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

and

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

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

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(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, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

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

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

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

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

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

B.26 Enhanced New Source Review [326 IAC 2]

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

B.27 Credible Evidence [326 IAC 2-8-4(3)][62 Federal Register 8313][326 IAC 2-8-5]

Notwithstanding the conditions of this permit specifying practices for applicable requirements, other credible evidence may also be used to establish compliance or noncompliance with applicable requirements.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

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

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

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

(a) The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

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

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

All required notifications shall be submitted to:

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

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

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

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

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

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

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

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days (this time frame is determined on a case by case basis, but no more than ninety (90) days) after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notify:

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

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

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

C.11 Monitoring Methods [326 IAC 3]

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

C.12 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.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

within 180 days from the date on which this source commences operation).

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

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3].

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-5][326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM,. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]

[326 IAC 2-8-5]

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

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

The documents submitted 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.16 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit a certified, 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
- (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, on or before the date it is due.

C.17 Monitoring Data Availability

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

- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

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

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

Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

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

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

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

Stratospheric Ozone Protection

C.20 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.

Construction Conditions [326 IAC 2-1-3.2]

C.21 General Construction Conditions

- This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

C.22 Effective Date of the Permit

- - (a) Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
 - (b) Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.
 - (c) All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

C.23 First Time Operation Permit

- This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to:

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

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]	
(a)	One (1) paint booth, designated as EU-01, with one (1) airless gun, with a maximum metal input capacity of 3600 lb/hr, controlled by dry filters and exhausts to stacks designated as S/V 01 A & B.
(b)	One (1) paint booth, designated as EU-05, with one (1) airless gun, with a maximum miscellaneous metal input capacity of 3600 lb/hr and exhausts to stacks designated as S/V 03, 04, 05.

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

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

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compounds (VOC) content of the coatings applied to miscellaneous metal parts shall be limited to:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Air Dried	3.5

- (b) 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 a manner that evaporation is minimized.

D.1.2 Volatile Organic Compounds (VOC) Limit [326 IAC 2-8] [326 IAC 2-3]

- (a) That the input VOC including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators of the paint booths shall be limited to 95 tons per year, rolled on a monthly basis.
- (b) During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed the limit specified.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The PM from the paint booths shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

- (b) The PM₁₀ emissions from the paint booths shall not exceed 2.74 pounds per hour.

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

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

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-8-5(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Volatile Organic Compounds (VOC)

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

D.1.7 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

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

D.1.8 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the paint booths are in operation.

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stacks while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.

Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

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

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, 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 usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.2.
 - (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 volume weighted VOC content of the coatings used 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.1.3, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

One (1) sand abrasive booth, constructed in 1986, utilized for cleaning metal parts before fabrication and painting, with an abrasive flow rate of 625 lb/hr, controlled by a water settling container and exhausts to a stack designated as S/V 02.

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

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

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the sand abrasive booth shall not exceed 1.88 pounds per hour when operating at a process weight rate of 625 pounds per hour.

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

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

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

- (b) The PM_{10} emissions from the sand abrasive booth shall not exceed 3.42 pounds per hour when operating at a process weight rate of 625 pounds per hour.

Compliance Determination Requirements

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

~~The Permittee is not required to test this facility by this permit. However, IDEM may require~~ compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM_{10} limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.2.3 Particulate Matter (PM)

The water settling tank for PM and PM_{10} control shall be in operation at all times when the sand abrasive booth is in operation and exhausting to the outside atmosphere.

D.2.4 Visible Emissions Notations

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

D.2.5 Water Settling Tank Inspections

- (a) An inspection shall be performed each calendar quarter of the water settling tank. Defective tank part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of tank part(s) replaced.
- (b) In the event that a water settling tank's failure has been observed:
 - (i) The affected process will be shut down immediately until the failed unit has been replaced.
 - (ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

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

D.2.6 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of daily visible emission notations of the sand abrasive booth stack exhaust.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections, parts replaced and corrective actions taken if necessary.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

One (1) mechanical blast unit, with a blast flow rate of 107, 500 lb/hr, controlled by a dust collector and exhausts inside the building.

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

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

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the mechanical blast unit shall not exceed 45.25 pounds per hour when operating at a process weight rate of 107,500 pounds per hour.

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

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

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

- (b) Pursuant to 326 IAC 2-8, the allowable PM₁₀ emissions rate from the mechanical blasting booth shall not exceed 15.29 pounds per hour when operating at a process weight rate of 107,500 pounds per hour.

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

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

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM₁₀ limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.3.4 Particulate Matter (PM)

The dust collector for PM and PM₁₀ control shall be in operation at all times when the mechanical blasting booth is in operation and exhausting to the outside atmosphere.

D.3.5 Visible Emissions Notations

- (a) Daily visible emission notations of the mechanical blasting booth at the point of exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

D.3.6 Dust Collector Inspections

An inspection shall be performed each calendar quarter of all the dust collector. Defective cartridges and collectors shall be replaced. A record shall be kept of the results of the inspection and the number of dust collectors and cartridges replaced.

D.3.7 Failure Detection

In the event that a dust collector's failure has been observed:

- (i) The affected compartments will be shut down immediately until the failed units have been replaced.
- (ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

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

D.3.8 Record Keeping Requirements

- (a) To document compliance with Condition D.3.5, the Permittee shall maintain records of daily visible emission notations of the mechanical blasting booth at the point of exhaust.
- (b) To document compliance with Condition D.3.6 and 3.7, the Permittee shall maintain records of the results of the inspections, parts replaced and corrective actions taken if necessary.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Insignificant Activities:

- (a) Twenty-Five (25) MIG welding stations, with a total maximum wire consumption rate of 10.31 lb/hr and exhausts to the general ventilation system of the building.
- (b) One (1) TIG welding station, with a total maximum wire consumption rate of 0.33lb/hr and exhausts to the general ventilation system of the building.
- (c) Six (6) stick welding stations, with a total maximum wire consumption rate of 0.08 lb/hr and exhausts to the general ventilation system of the building.
- (d) One (1) flame cutting plasma table, with a maximum metal thickness cut of 5.0 inches, a maximum metal cutting rate of 6.0 in/min and exhausts to the general ventilation system of the building.
- (e) Fourteen (14) radiant heaters, with a maximum heat input capacity of 0.15 mmBtu/hr each. Six (6) radiant heater s are used in the paint booth and eight (8) radiant heater s are used in the main shop and exhausts inside the building.
- (f) Thirteen (13) Oxyacetylene flame-cutting stations, constructed in 1986, with a maximum metal thickness cut of 0.5 inches, a maximum metal cutting rate of 1.2 in/min and exhausts to the general ventilation system of the building.

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

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) The PM allowable emissions from the welding operations shall not exceed the pound per hour emission rate established as E in the following formula.

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:
$$E = 4.10 P^{0.67}$$
 where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour.

Compliance Determination Requirements

D.4.2 Testing Requirements [326 IAC 2-8-5(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

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

Source Name: Padgett, Inc.
Source Address: 901 E. Fourth Street, New Albany, IN. 47151
Mailing Address: P.O. Box 1375, New Albany, IN. 47151-1375
FESOP No.: F043-9832-00049

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Padgett, Inc.
Source Address: 901 E. Fourth Street, New Albany, IN. 47151
Mailing Address: P.O. Box 1375, New Albany, IN. 47151-1375
FESOP No.: F043-9832-00049

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

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

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

FESOP Quarterly Report

Source Name: Padgett, Inc.
Source Address: 901 E. Fourth Street, New Albany, IN. 47151
Mailing Address: P.O. Box 1375, New Albany, IN. 47151-1375
FESOP No.: F043-9832-00049
Facility: Two (2) paint booths
Parameter: VOC
Limit: 95 tons per year

YEAR: _____

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

9 No deviation occurred in this 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**

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

Source Name: Padgett, Inc.
 Source Address: 901 E. Fourth Street, New Albany, IN. 47151
 Mailing Address: P.O. Box 1375, New Albany, IN. 47151-1375
 FESOP No.: 043-9832-00049

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

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

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

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

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for Federally Enforceable State Operating Permit (FESOP) with Enhanced New Source Review (ENSR)

Source Background and Description

Source Name:	Padgett, Inc.
Source Location:	901 E. Fourth Street, New Albany, IN. 47151
County:	Floyd
Construction Permit No.:	CP-043-9832-00049
SIC Code:	3441
Permit Reviewer:	Nysa L. James

The Office of Air Management (OAM) has reviewed an application from Padgett, Inc. relating to the construction and operation of metal fabrication operation, consisting of the following equipment:

Permitted Emission Units and Pollution Control Equipment

There are no permitted facilities existing at this source because this source is an entirely new source.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR:

- (a) One (1) paint booth, with one (1) airless gun, with a maximum metal input capacity of 3600 lb/hr, controlled by dry filters and exhausts to stacks designated as S/V 01 A & B.
- (b) One (1) sand abrasive booth, constructed in 1986, utilized for cleaning metal parts before fabrication and painting, with an abrasive flow rate of 625 lb/hr, controlled by a water settling container and exhausts to a stack designated as S/V 02.
- (c) Thirteen (13) Oxyacetylene flame-cutting stations, constructed in 1986, with a maximum metal thickness cut of 0.5 inches, a maximum metal cutting rate of 1.2 in/min and exhausts to the general ventilation system of the building.

New Emission Units and Pollution Control Equipment Requiring ENSR

- (a) One (1) paint booth, designated as EU-05, with one (1) airless gun, with a maximum miscellaneous metal input capacity of 3600 lb/hr and exhausts to stacks designated as S/V 03, 04, 05.
- (b) One (1) mechanical blast unit, with a blast flow rate of 120, 500 lb/hr, controlled by a dust collector which is an integral part of the unit and exhausts inside the building.

Insignificant Activities

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

- (a) Twenty-Five (25) MIG welding stations, with a total maximum wire consumption rate of 10.31 lb/hr and exhausts to the general ventilation system of the building.
- (b) One (1) TIG welding station, with a total maximum wire consumption rate of 0.33lb/hr and exhausts to the general ventilation system of the building.
- (c) Six (6) stick welding stations, with a total maximum wire consumption rate of 0.08 lb/hr and exhausts to the general ventilation system of the building.
- (d) One (1) flame cutting plasma table, with a maximum metal thickness cut of 5.0 inches, a maximum metal cutting rate of 6.0 in/min and exhausts to the general ventilation system of the building.
- (e) Fourteen (14) radiant heaters, with a maximum heat input capacity of 0.15 mmBtu/hr each. Six (6) radiant heater s are used in the paint booth and eight (8) radiant heater s are used in the main shop and exhausts inside the building.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S/V 01 A & B	Paint Booth	36	18	6200	Ambient
S/V 02	Sand Blast Booth	11	3.83 x 3.83 (rectangular)	7200	Ambient
SV03, 04, and 05	Paint Booth	21	1	4400	Ambient
Inside Building	Mechanical Blast Booth	12	0.8	2800	Ambient
Inside Building	Radiant heaters	30	0.34	N/A	250
Inside Building	General Shop Exhaust	25	2.5	36,000	Ambient

Enforcement Issue

IDEM is aware that the abrasive booth, all welding operations and paint booth have been constructed and operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

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

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

An application for the purposes of this review was received on June 24, 1997, with additional information received on June 8, 1998.

The original permit application was received on June 24, 1997. The draft FESOP public notice period was from April 16, 1998 to May 16, 1998. After the public notice period ended, the Office of Air Management received additional information for new equipment that the source wanted to include in the FESOP. The level of the new equipment was determined to be significant, therefore the FESOP shall be re-public noticed. The FESOP number originally assigned, 043-8917, has been changed to reflect the new equipment submitted. The new FESOP number is 043-9832-00049.

Emissions Calculations

See Appendix A (Emissions Calculation Spreadsheets) for detailed calculations (five (5) pages).
 Mechanical Blasting Emission Calculations:

$$\text{Potential PM Emissions} = 107,500 \text{ lb/hr (blast rate)} * 0.004 \text{ lb PM/lb abrasive} = 430 \text{ lb/hr.}$$

$$= 430 \text{ lb/hr} * 8760 \text{ hrs/yr} * 1 \text{ ton/} 2000 \text{ lb} = \mathbf{1883.4 \text{ ton/yr.}}$$

$$\text{Potential PM}_{10} \text{ Emissions} = 107,500 \text{ lb/hr (blast rate)} * (0.004 * 0.86) \text{ lb PM}_{10}/\text{lb abrasive} =$$

$$369.8 \text{ lb/hr} = 369.8 \text{ lb/hr} * 8760 \text{ hrs/yr} * 1 \text{ ton/} 2000 \text{ lb} = \mathbf{1619.72 \text{ ton/yr.}}$$

$$\text{After Control PM emissions} = 1883.4 \text{ tons/yr} * (1 - 0.999) \text{ (removal efficiency)} = \mathbf{1.88 \text{ ton/yr.}}$$

$$\text{After Control PM}_{10} \text{ emissions} = 1619.72 \text{ tons/yr} * (1 - 0.999) \text{ (removal efficiency)} = \mathbf{1.62 \text{ ton/yr.}}$$

Total Potential and Allowable 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.”

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

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	345.03	2096.67
Particulate Matter (PM10)	--	1832.99
Sulfur Dioxide (SO ₂)	--	0.01
Volatile Organic Compounds (VOC)	140.98	140.98
Carbon Monoxide (CO)	--	0.19
Nitrogen Oxides (NO _x)	--	0.92
Glycol Ethers	--	3.01
Xylene	--	3.01
Combination of HAPs	--	6.02

- (a) Allowable emissions are determined from the applicability of rule 326 IAC 6-3-2 and 326 IAC 8-2-9.

(i) 326 IAC 6-3 (Process Operations):

The paint booths, welding stations, and abrasive booth shall comply with 326 IAC 6-3-2(c) using the following equation:

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

- (a) Abrasive Booth Allowable Emissions = $4.10 * (625 \text{ lb/hr} * 1 \text{ ton}/2000\text{lb})^{0.67} = 1.88 \text{ lb/hr} * 8760 \text{ hr}/1 \text{ yr} * 1 \text{ ton}/2000 \text{ lb} = 8.24 \text{ ton/yr.}$

(ii) 326 IAC 6-3 (Process Operations):

The mechanical blasting operation shall comply with 326 IAC 6-3-2(c) using the following equation:

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

- (a) Mechanical Unit Allowable Emissions = $55.0 * (107,500 \text{ lb/hr} * 1 \text{ ton}/2000 \text{ lb})^{0.11} - 40 = 45.25 \text{ lb/hr} * 8760 \text{ hr}/1 \text{ yr} * 1 \text{ ton}/2000 \text{ lb} = 198.20 \text{ ton/yr.}$

Total allowable emissions from 326 IAC 6-3-2 = paint booths + abrasive booth + mechanical blasting unit + welding operations = $135.24 + 8.24 + 198.20 + 3.35 = 345.03 \text{ ton/yr.}$

The source complies with 326 IAC 6-3 because of the control equipment used in the mechanical shot blasting booth, paint booths and abrasive booth reduce after control emissions below 326 IAC 6 -3 allowable levels and the potential emissions of the heaters and welding operations are less than allowables.

(ii) 326 IAC 8-2-9 (VOC Limitations):

The limit for air dried paint is 3.5 lbs VOC/gal of coating less water applied.

The source is in compliance with this limit of 3.5 lbs VOC/gal of coating less water applied because each paint used is less than 3.5 lb VOC per gallon less water.

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

- (d) The potential emissions (as defined in the Indiana Rule) of particulate matter 10 microns in diameter or less (PM10) and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (e) 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.
- (f) **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 PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

- (a) The source has accepted a federally enforceable limit on potential to emit particulate matter 10 microns or less in diameter (PM-10) of 99.0 tons per year, consisting of:
 - (i) 15.0 tons per year for the abrasive booth and;
 - (ii) 12.0 tons per year for the paint booth and;
 - (iii) 67.0 tons per year for the mechanical blasting booth and;
 - (iv) 5.0 tons per year for the overall insignificant activities.
- (b) The source has accepted a federally enforceable limit on potential to emit VOC of 99.0 tons per year, consisting of:
 - (i) 95 tons per year for the two (2) paint booths and;
 - (ii) 5 tons per year for the overall insignificant activities.

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

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	Combination HAPs
Abrasive Booth	1.49	1.49	--	--	--	--	--
Paint Booth EU-01	1.62	1.62	--	84.33	--	--	6.02
Paint Booth EU-05	1.09	1.09	--	56.6	--	--	--
Mechanical Blasting Booth	1.88	1.62	--	--	--	--	--
Fourteen (14) Heaters	0.11	0.11	0.01	0.05	0.19	0.92	--
Welding Operations (Insignificant)	3.35	3.35	--	--	--	--	--
Total Emissions	9.54	9.28	0.01	140.98	0.19	0.92	6.02
Limited PTE Mechanical Blasting Booth	--	67.0	--	--	--	--	--
Limited PTE Paint Booths	--	12.0	--	95	--	--	24
Limited PTE Abrasive Booth	--	15.0	--	--	--	--	--
Limited PTE Insignificant Activities	--	5.0	--	4.0	--	--	--
FESOP PTE Limits	99	99	99	99	99	99	24

County Attainment Status

The source is located in Floyd County.

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

- (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. Floyd County has been designated as nonattainment for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Floyd County has been classified as attainment or unclassifiable for PM₁₀, CO and SO₂. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) 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 PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (ton/yr)
PM	9.54
PM10	9.28
SO ₂	0.01
VOC	99.0
CO	0.19
NO _x	0.92
Glycol Ethers	3.01
Xylene	3.01
Combination HAPs	6.02

- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2 and 2-3, and 40 CFR 52.21, the PSD and Emission Offset requirements do not apply.

Federal Rule Applicability

- (c) There are no New Source Performance Standards 40 CFR Part 60 applicable to this facility.
- (d) There are no NESHAP 40 CFR Part 63 applicable to these facilities.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration) does not apply because the PTE is less than 250 tons/yr.

326 IAC 2-3 (Emission Offset) does not apply because the source's VOC PTE is limited to 99.0 tons per year.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because the source emits more than 10 tons/yr of VOC and is located in Floyd County. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by April 15 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

326 IAC 5-1-2 (Opacity Limitations):

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

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

326 IAC 1-6-3 (Preventative Maintenance):

- (a) The Permittee shall prepare and maintain Preventative Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

- (b) The Permittee shall implement the Preventative 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 and OAM upon request and shall be subject to review and approval by IDEM and OAM.

326 IAC 6-4 (Fugitive Dust Emissions):

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

State Rule Applicability - Miscellaneous Metal Paint Booths

326 IAC 2-3 (Emission Offset) does not apply to the paint booths because the VOC emissions are less than 100 tons per year. The two (2) paint booths shall be limited to the following:

- (a) That the input VOC including clean up solvent, minus the VOC solvent shipped out, delivered to the applicators of the paint booths shall be limited to 95 tons per year, rolled on a monthly basis.
- (b) During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed the limit specified.

326 IAC 6-3 (Process Operations):

Pursuant to 326 IAC 6-3 (Process Operations):

- (a) The dry filters for particulate matter overspray control shall be in operation at all times when the paint booth is in operation.
- (b) The paint booths shall comply with 326 IAC 6-3-2(c) using the following equation:
$$E = 4.10P^{0.67}$$
 where: E = rate of emission in pounds per hour,
P = process weight in tons per hour, if
P is equal to or less than 60,000 lbs/hr (30 tons/hr)
- (c) Daily inspections shall be performed to verify the placement, integrity and particulate loading of the filters.
- (d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

326 IAC 8-2-9 (VOC Limitations) applies to the paint booths because the VOC emissions are greater than 15 pounds per day and the source paints miscellaneous metal parts and constructed after July 1, 1990.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compounds (VOC) content of the coatings applied to miscellaneous metal parts shall be limited to:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Air Dried	3.5

Based on emission calculations (page 1 of 5), this source is in compliance with the 3.5 lb VOC per gallon of coating less water limit.

326 IAC 8-2-9 (Emission Minimization):

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 a manner that evaporation is minimized.

No other 326 IAC 8 rules apply.

State Rule Applicability - Sand Abrasive Booth

326 IAC 6-3 (PM Process):

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the water settling tank shall be in operation at all times when abrasive booth is in operation, and shall not exceed the allowable particulate matter (PM) emission rate of 1.88 pounds per hour. The abrasive booth shall comply with 326 IAC 6-3-2(c) using the following equation:
$$E = 4.10P^{0.67};$$
 where P = process weight in tons per hour;
E = rate of emission in pounds per hour.
- (b) The water settling tank shall be operated at all times when the abrasive booth is in operation.
- (c) An inspection shall be performed each calendar quarter of the water settling tank. Defective tank part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of tank part(s) replaced.
- (d) In the event that a tank's failure has been observed:
 - (i) The affected process will be shut down immediately until the failed unit has been replaced.
 - (ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

- (e) Visible emission notations of all exhaust to the atmosphere from the water settling tank shall be performed once per working shift. A trained employee will record whether emissions are normal or abnormal.
 - (i) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, 80% of the time, the process is in operation, not counting start up or shut down time.
 - (ii) In the case of batch or discontinuous operation, readings shall be taken during that part of the operation specified in the facility's specific condition prescribing visible emissions.
 - (iii) 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 and abnormal visible emissions for that specific process.
 - (iv) The Preventive Maintenance Plan for this facility shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

No 326 IAC 8 rules apply because there are no VOC emissions from this facility.

State Rule Applicability - Mechanical Blast Unit

326 IAC 6-3 (PM Process):

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the dust collector shall be in operation at all times when mechanical blasting is in operation, and shall not exceed the allowable particulate matter (PM) emission rate of 45.25 pounds per hour. The mechanical blasting operation shall comply with 326 IAC 6-3-2(c) using the following equation:
$$E = 55.0 * P^{0.11} - 40;$$
 where P = process weight in tons per hour;
E = rate of emission in pounds per hour.
- (b) The dust collector shall be operated at all times when the mechanical blasting booth is in operation.
- (c) An inspection shall be performed each calendar quarter of the all the dust. Defective cartridges and collectors shall be replaced. A record shall be kept of the results of the inspection and the number of dust collectors and cartridges replaced.
- (d) In the event that a dust collector's failure has been observed:
 - (i) The affected compartments will be shut down immediately until the failed units have been replaced.
 - (ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

- (e) Visible emission notations of all exhaust to the atmosphere from the dust collector shall be performed once per working shift. A trained employee will record whether emissions are normal or abnormal.
 - (i) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, 80% of the time, the process is in operation, not counting start up or shut down time.
 - (ii) In the case of batch or discontinuous operation, readings shall be taken during that part of the operation specified in the facility's specific condition prescribing visible emissions.
 - (iii) 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 and abnormal visible emissions for that specific process.
 - (iv) The Preventive Maintenance Plan for this facility shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

No 326 IAC 8 rules apply because there are no VOC emissions from this facility.

State Rule Applicability - Welding Operations

326 IAC 6-3 (Process Operations):

Pursuant to 326 IAC 6-3 (Process Operations):

- (a) All thirteen (13) Oxyacetylene flame-cutting stations operations shall comply with 326 IAC 6-3-2(c) using the following equation:

$$E = 4.10P^{0.67} \quad \text{where: } E = \text{rate of emission in pounds per hour,}$$

P = process weight in tons per hour, if
P is equal to or less than 60,000 lbs/hr (30 tons/hr).

No 326 IAC 8 rules apply because there are no VOC emissions from these facilities.

State Rule Applicability - Radiant Heaters

326 IAC 6-2 does not apply because the facilities are not used for indirect heating.

Compliance Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

1. The mechanical blasting booth has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the mechanical blasting booth shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.
 - (b) An inspection shall be performed each calendar quarter of the all the dust. Defective cartridges and collectors shall be replaced. A record shall be kept of the results of the inspection and the number of dust collectors and cartridges replaced. In the event that a dust collector's failure has been observed:
 - (i) The affected compartments will be shut down immediately until the failed units have been replaced.
 - (ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.
2. The abrasive booth has applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the abrasive booth shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest

emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

- (b) An inspection shall be performed each calendar quarter of the water settling tank. Defective tank part(s) shall be replaced. A record shall be kept of the results of the inspection and the number of scrubber part(s) replaced. In the event that a tank's failure has been observed:
 - (i) The affected process will be shut down immediately until the failed unit has been replaced.
 - (ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion

- 3. The paint booths has applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particulate loading of the filters.
 - (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dust collector, water settling tank and dry filters must operate properly to ensure compliance with 326 IAC 6-3 and 326 IAC 2-8.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 189 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

- (a) This new operation will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.
- (b) See attached spreadsheets for detailed air toxic calculations (page 2 of 5).
- (c) 326 IAC 2-1-3.4 (MACT) does not apply to the source because single HAPs emissions are less than 10 tons/yr a combination HAPs are less than 25 tons/yr.

Conclusion

The construction of this metal fabrication operation will be subject to the conditions of the attached proposed **FESOP ENSR No. F-043-9832-00049**.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for New Construction and Operation

Source Name: Padgett, Inc.
 Source Location: 901 E. Fourth Street, New Albany, Indiana 47151-1375
 County: Floyd
 Construction Permit No.: CP-043-9832-00049
 SIC Code: 3441
 Permit Reviewer: Nysa L. James

On June 30, 1998, the Office of Air Management (OAM) had a notice published in the New Albany Tribune, 180 West Spring Street, New Albany, Indiana, stating that Padgett, Inc. had applied for a construction permit to construct and operate metal fabrication operation with dust collectors and dry filter as control. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the Office of Air Management has made the following changes (changes are bolded and stricken out for emphasis):

1. Condition D.1.10, Record Keeping Requirements, is amended to the following (changes are bolded and stricken out for emphasis):

D.1.10 Record Keeping Requirements

-
- (a) To document compliance with Conditions D.1.1 **and D.1.2**, 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 usage limits and/or the VOC emission limits established in Condition D.1.1 **and D.1.2**.
- (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 volume weighted VOC content of the coatings used 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.1.2 ~~3~~, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

- 2. Condition D.1.11, Reporting Requirements, is amended to the following (changes are bolded and stricken out for emphasis):

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.11 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

- 3. Condition D.2.6, Record Keeping Requirements, is amended to the following (changes are bolded and stricken out for emphasis):

D.2.6 Record Keeping Requirements

(a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the sand abrasive booth stack exhaust.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain records of the results of the inspections, parts replaced and corrective actions taken if necessary.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

- 3. Condition D.3.5(a), Visible Emission Notations, is amended to the following (changes are bolded and stricken out for emphasis):

(a) Daily visible emission notations of the mechanical blasting booth ~~stack at the point of~~ exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- 4. Condition D.3.8, Record Keeping Requirements, is amended to the following (changes are bolded and stricken out for emphasis):

D.3.8 Record Keeping Requirements

(a) To document compliance with Condition D.3.5, the Permittee shall maintain records of daily visible emission notations of the mechanical blasting booth ~~stack at the point of~~ exhaust.

(b) To document compliance with Condition D.3.5 and 3.6, the Permittee shall maintain records of the results of the inspections, parts replaced and corrective actions taken if necessary.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

Padgett, Inc.
901 E. Fourth Street
New albany, Indiana 47151

Affidavit of Construction

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

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Padgett, Inc., 901 E. Fourth Street, New albany, Indiana 47151, has constructed the metal fabrication operation in conformity with the requirements and intent of the construction permit application received by the Office of Air Management on (? date) and as permitted pursuant to **Construction Permit No. CP-043-8719, Plant ID No. 043-00049** issued on _____

Further Affiant said not.

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

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

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

My Commission expires: _____

Signature

Name (typed or printed)

**Appendix A: Emission Calculations
 Natural Gas Combustion Only
 MM Btu/hr 0.3 - < 10
 Commercial Boiler**

Company Name: Padgett, Inc.
Address City IN Zip: 901 E. Fourth Street, New Albany, IN. 47151
CP: 043-8719
Plt ID: 043-00049
Reviewer: NLJ
Date: 3/13/98

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.1

18.4

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.9	11.9	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.11	0.11	0.01	0.92	0.05	0.19

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

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

Appendix A: Emission Calculations

Abrasive Blasting

Company Name: Padgett, Inc.
Address City IN Zip: 901 E. Fourth Street, New Albany, IN. 47151
CP: 043-8719
Pit ID: 043-00049
Reviewer: NLJ
Date: 3/12/98

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	160
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 =

625
99
99
0.375
0.325

Flow Rate (FR) (lb/hr) = 832.101 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =
 FR = Flow Rate (lb/hr) =
 w = fraction of time of wet blasting =
 N = number of nozzles =

0.041
832.101
100 %
1

Uncontrolled Emissions =	17.06 lb/hr
	74.71 ton/yr

Controlled Emissions =	0.34 lb/hr
	1.49 ton/yr

METHODOLOGY

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)

HAP Emission Calculations

Company Name: Padgett, Inc.

Plant Location: 901 E. Fourth Street, New Albany, IN. 47151

County: Floyd

Permit Reviewer: NLJ

Date: 3/12/98

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)
Enamel	8.6	1.000000	4.00	2.00%	2.00%	3.01	3.01

Total State Potential Emissions

3.01

3.01

METHODOLOGY

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

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

Company Name: Padgett, Inc.
Address City IN Zip: 901 E. Fourth Street, New Albany, IN. 47151
CP: 043-8719
Plt ID: 043-00049
Reviewer: NLJ
Date: 3/12/98

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Intherthane	12.5	20.68%	0.0%	20.7%	0.0%	68.00%	1.00000	5.000	2.59	2.59	12.93	310.20	56.61	54.28	3.80	75%

State Potential Emissions

Add worst case coating to all solvents

12.93 310.20 56.61 54.28

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

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

Company Name: Padgett, Inc.
Address City IN Zip: 901 E. Fourth Street, New Albany, IN. 47151
CP: 043-8719
Plt ID: 043-00049
Reviewer: NLJ
Date: 3/12/98

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Primer	13.3	20.68%	0.0%	20.7%	0.0%	60.15%	1.00000	7.000	2.75	2.75	19.25	462.07	84.33	80.86	4.57	75%

State Potential Emissions

Add worst case coating to all solvents

19.25 462.07 84.33 80.86

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations

Company Name: Padgett, Inc.
Address City IN Zip: 901 E. Fourth Street, New Albany, IN. 47151
CP: 043-8719
Plt ID: 043-00049
Reviewer: NLJ
Date: 3/13/98

1. From Welding Process

Number of Welding Stations	Maximum Throughput of Weld Wire/Metal (lbs/yr)	Maximum Wire/Metal Consumed per Station (lbs/hr)	Electrode Type	PM-10 (0.037 tons/yr)	HAP		
					Cr (tons/yr)	Mn (0.003 tons/yr)	Ni (tons/yr)
					--		--
25 (MIG)	90315.6	10.31	Default	1.67	0.00	0.14	0.00
1 (TIG)	2890.8	0.33	Default	0.05	0.00	0.00	0.00
6 (Stick)	700.8	0.08	Default	0.01	0.00	0.00	0.00
Total				1.74	0.00	0.14	0.00

METHODOLOGY

Emission factors are from the SARA Reporting Guide where emission factors are in lb pollutant/lb electrode.
 Throuput (lbs/yr) = Maximum Wire consumed per station (lbs/hr) * 8760 (hrs/yr)
 Pollutant Emission (tons/yr) =Throuput (lbs/yr) * Emission factor (lbs/ lb)/2000 (lbs/ton)

2. From flame-cutting

Number of Station (Oxyacetylene)	Maximum Throughput of Cutting Metal (kin/yr)	Maximum Metal Thickness Cut (in)	Maximum Metal Cutting Rate (in/min)	PM-10 (0.1622 tons/yr)	HAP		
					Cr (0.0003 tons/yr)	Mn (0.0005 tons/yr)	Ni (0.0001 tons/yr)
1	15768.00	5	6	1.2788	0.0000	0.0000	0.0000
13	4099.68	0.50	1.20	0.3325	0.0006	0.0010	0.0002

METHODOLOGY *

Emission factors are from SARA 313 Reporting Guide, the units are lbs/kin of metal cutted
 Throuput (kin/yr) = Station Number *Maximum Metal Thickness cut (in)/1(in)* Maximum Metal Cutting Rate (in/min)*60(min/hr) * 8760 (hrs/yr)/1000
 Pollutant Emission (tons/yr) =Throuput (kin/yr) * Emission factor (lbs/ kin)/2000 (lbs/ton)

* NOTE: The Methodology are from SARA Reporting Guide