

Mr. Randy Engler
Schwab Corporation
P.O. Box 5088
Lafayette, Indiana 47903-5088

Re: MMT 123-9837
First Minor Modification to
Part 70 OP T123-7304-00018

Dear Mr. Engler:

Schwab Corporation was issued a Part 70 Operating Permit on May 5, 1998 for a stationary metal office products manufacturing operation. A letter requesting a minor modification was received on June 9, 1998. Pursuant to the provisions of 326 IAC 2-7-12(b) the permit is hereby approved as described in the attached Technical Support Document and Emission Calculations.

The modification consists of adding one spray booth and welding units from the Lafayette source to the Cannelton source, removing the stack from the patch grinding booth and removing one spray booth from the Cannelton source. The source is also fulfilling the requirements of 326 IAC 2-1-3.2 (State construction and operating permits: enhanced new source review).

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

This decision is subject to the Indiana Administrative Orders and Procedures Act -IC 4-21.5-3-5. If you have any questions on this matter, please contact Catherine Moore, of my staff, at 317-233-2637 or 1-800-451-6027 (ext 3-2637).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

cam

cc: File - Perry County
U.S. EPA, Region V
Perry County Health Department
Air Compliance Section - Dave Holder
Compliance Data Section - Jerri Curless
Administration and Development Section - Janet Mobley
Technical Support and Modeling - Nancy Landau

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Schwab Corporation
Route 66 East
Cannelton, Indiana 47530**

(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 2-7 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.: T123-7304-00018	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: May 5, 1998
First Minor Modification: MMT123-9837	Pages Affected: 4, 27-29a
Issued by: Janet G. McCabe, Assistant Commissioner 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) and presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary metal office products manufacturing operation

Responsible Official: Randy Engler
Source Address: Route 66 East, Cannelton, Indiana 47530
Mailing Address: P.O. Box 5088, Lafayette, Indiana 47903-5088
SIC Code: 3499
County Location: Perry
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (1) One (1) file cabinet spray booth, identified as FB, with a maximum capacity of fifteen (15) file cabinets per hour, using a water wash wall as control, exhausting to two (2) stacks (SV-1 and SV-2);
- (2) One (1) sheet metal spray booth, identified as SB, with a maximum capacity of seventy-five (75) file cabinets per hour, using a water wash wall as control, exhausting to one (1) stack (SV-3);
- (3) One (1) complete safe painting spray booth, identified as PB, with a maximum capacity of 1.8 file cabinets per hour, using a waterwall spray booth filter as control, exhausting to one (1) stack (SV-8);
- (4) One (1) patch (grinding) booth, identified as GB, with a maximum capacity of ten (10) cabinets per day, using dry filters for Particulate Matter (PM) control, exhausting indoors;
- (5) One (1) glass shot blast for cleaning, identified as BA, using a baghouse as control, exhausting to one (1) stack (SV-6);
- (6) One (1) mixer for dry and wet insulation (fire proofing) ingredients, identified as MX, with a maximum capacity of 4685 pounds of insulation per hour, exhausting to one (1) stack (SV-7); and
- (7) TIG and MIG welding stations, identified as WELD, exhausting to one (1) stack (GV-1).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

SECTION D.1

FACILITY OPERATION CONDITIONS

- (1) One (1) file cabinet spray booth, identified as FB, with a maximum capacity of fifteen (15) file cabinets per hour, using a water wash wall as control, exhausting to two (2) stacks (SV-1 and SV-2);
- (2) One (1) sheet metal spray booth, identified as SB, with a maximum capacity of seventy-five (75) file cabinets per hour, using a water wash wall as control, exhausting to one (1) stack (SV-3);
- (3) One (1) complete safe painting spray booth, identified as PB, with a maximum capacity of 1.8 file cabinets per hour, using a waterwall spray booth filter as control, exhausting to one (1) stack (SV-8);
- (4) One (1) patch (grinding) booth, identified as GB, with a maximum capacity of ten (10) cabinets per day, using dry filters for Particulate Matter (PM) control, exhausting indoors;
- (5) One (1) glass shot blast for cleaning, identified as BA, using a baghouse as control, exhausting to one (1) stack (SV-6);
- (6) One (1) mixer for dry and wet insulation (fire proofing) ingredients, identified as MX, with a maximum capacity of 4685 pounds of insulation per hour, exhausting to one (1) stack (SV-7); and
- (7) TIG and MIG welding stations, identified as WELD, exhausting to one (1) stack (GV-1).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

- (a) Any change or modification to the two (2) spray booths (FB and SB) or the one (1) mixer (MX) must be approved by the Office of Air Management (OAM) before such change or modification can occur.
- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Requirements):
 - (1) The one (1) complete safe painting spray booth (PB) shall not cause, allow or permit the discharge into the atmosphere of any Volatile Organic Compound (VOC) in excess of 3.5 pounds per gallons of coating excluding water for air dried coatings.
 - (2) Solvent sprayed from application equipment of the one (1) complete safe painting spray booth (PB), during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.1a Volatile Organic Compound (VOC) [326 IAC 2-2]

The use of the one (1) post office spray booth (POB) shall be permanently discontinued. Any change or modification that would require the use of the one (1) post office spray booth (POB) shall trigger applicability to 326 IAC 2-2 (Prevention of Significant Deterioration) and must be approved by the Office of Air Management before such change or modification can occur.

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

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM from the one (1) spray booth (FB), the one (1) spray booth (SB), the one (1) complete safe painting spray booth (PB), the one (1) mixer for dry and wet insulation (fire proofing) ingredients, the one (1) patch (grinding) booth (GB), the one (1) glass shot blast for cleaning, and the TIG and MIG welding stations shall not exceed the pound per hour emission rate as 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.1.3 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the volatile organic compound (VOC) or particulate matter (PM) limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.4 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2:

- (a) The water wash wall for PM control shall be in operation at all times when the three (3) paint booths (FB, SB and PB) are in operation.
- (b) The baghouse for PM control shall be in operation at all times when the one (1) glass shot blast is in operation.
- (c) The dry filters for PM control shall be in operation at all times when the one (1) patch (grinding) booth is in operation.

D.1.5 Visible Emissions Notations

- (a) Daily visible emission notations of the three (3) spray booths (FB, SB and PB), one (1) patch grinding booth (GB), one (1) glass shot blast for cleaning (BA), one (1) mixer (MX), and the TIG and MIG welding stations (Weld) stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.6 Monitoring

- (a) 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 an overspray emission, evidence of overspray emission, or other abnormal 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.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the glass shot blast operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.1.8 Broken Bag or Failure Detection

In the event that bag failure has been observed:

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

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2 and D.1.6, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the three (3) spray booths (FB, SB and PB), one (1) patch grinding booth (GB), one (1) glass shot blast for cleaning (BA), one (1) mixer (MX), and the TIG and MIG welding stations (Weld) stack exhaust.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event.

- (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
- (d) To document compliance with Condition D.1.1(b), 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.
- (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.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

Technical Support Document for the Minor Modification to the
Part 70 Operating Permit
and Enhanced New Source Review (ENSR)

Source Name: Schwab Corporation
Source Location: Route 66 East, Cannelton, Indiana 47530
County: Perry
SIC Code: 3499
Minor Modification No.: MMT123-9837-00018
Operation Permit No.: T123-7304-00018
Permit Reviewer: Catherine Moore

The Part 70 Operating Permit was issued on May 5, 1998. On June 9, 1998, Schwab Corporation filed an Amendment requesting certain changes to the permit.

History

Schwab Corporation previously operated two (2) plants in Indiana. One source was located in Lafayette (Tippecanoe County) and this source located in Cannelton (Perry County). As of May, 1998, the Lafayette source ceased operation. Some of the facilities at the Lafayette source have been moved down to the Cannelton source.

This modification consists of adding the following facilities from the Lafayette source to the Cannelton source's Part 70 Operating Permit Requirements:

- (a) One (1) complete safe painting spray booth, identified as PB, with a maximum capacity of 1.8 file cabinets per hour, using a waterwall spray booth filter as control, exhausting to one (1) stack (SV-8); and
- (b) Ten (10) MIG welding stations using a maximum of 7.5 pounds of mild steel wire per hour and four (4) TIG welding stations using a maximum of 0.35 pounds of metal per hour, all exhausting (along with the existing welding stations) to one (1) stack (GV-1).

This modification also consists of

- (a) The one (1) patch grinding booth (GB) has been moved and now vents indoors rather than to stack SV-5. This stack has been removed and capped.
- (b) The one (1) post office spray booth (POB) has been removed and replaced with the one (1) complete safe painting spray booth (PB). This will result in a net **decrease** in potential Volatile Organic Compound (VOC) emissions of 307.74 tons per year, a net **decrease** of potential Particulate Matter (PM) emissions of 113.47 tons per year and a net **decrease** of potential Hazardous Air Pollutant (HAP) emissions of 200.5 tons per year. The use of the one (1) post office spray booth (POB) shall be permanently discontinued.

State / Federal Rule Applicability

The one (1) complete safe painting spray booth (PB) is subject to the following requirements:

- (a) The one (1) spray booth is subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Requirements) because it was constructed after July 1, 1990 and will have actual VOC emissions of greater than fifteen (15) pounds per day. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Requirements), the one (1) complete safe painting spray booth (PB) shall not cause, allow or permit the discharge into the atmosphere of any Volatile Organic Compound (VOC) in excess of 3.5 pounds per gallons of coating excluding water for air dried coatings. Based on the Material Safety Data Sheets (MSDS) submitted, the one (1) complete safe painting spray booth (PB) is in compliance with this requirement. See Page 1 of 2, TSD Appendix A for detailed emission calculations. Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (b) Pursuant to 326 IAC 6-3-2 (Process Operations), the PM from the one (1) spray booth (PB) shall not exceed the pound per hour emission rate as 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:
- $$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$
- (c) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), this existing source is a major source. However, the modification of removing the one (1) post office spray booth (POB) and the addition of the one (1) painting spray booth (PB) and welding operations are not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) because the potential Volatile Organic Compound (VOC) emissions are less than forty (40) tons per year, the potential Particulate Matter (PM) emissions are less than twenty-five (25) tons per year and the potential PM₁₀ emissions (assuming PM = PM₁₀) are less than fifteen (15) tons per year after controls. Any change or modification to this either painting spray booth or welding operations that would cause potential Volatile Organic Compound (VOC) emissions to be greater than forty (40) tons per year, potential Particulate Matter (PM) emissions to be greater than twenty-five (25) tons per year or potential PM₁₀ emissions to be greater than fifteen (15) tons per year shall trigger applicability to 326 IAC 2-2 (Prevention of Significant Deterioration) and must be approved by the Office of Air Management (OAM) before such change can occur.
- (d) The one (1) painting spray booth is not subject to the requirements of 326 IAC 2-1-3.4 (New Source Toxics Control), as specified in 40 CFR 63.41, "Definition of construction of a major source", subpart (2), because this modification is not a "new" or "reconstructed" source and because the potential Hazardous Air Pollutant (HAP) emissions from this process for any single HAP is less than ten (10) tons per year and for all HAPs is less than twenty-five (25) tons per year.

- (e) There are no New Source Performance Standards (40 CFR 60) subject to this facility.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP's) (40 CFR 61, 40 CFR 63) subject to this facility.

The ten (10) MIG welding stations and four (4) TIG welding stations are subject to the following requirements:

- (a) Pursuant to 326 IAC 6-3-2(c), the Particulate Matter (PM) emissions from the ten (10) MIG welding stations and four (4) TIG welding stations shall not exceed the pound per hour emission rate as 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) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), this existing source is a major source. However, the modification of removing the one (1) post office spray booth (POB) and the addition of the one (1) painting spray booth (PB) and welding operations are not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) because the potential Volatile Organic Compound (VOC) emissions are less than forty (40) tons per year, the potential Particulate Matter (PM) emissions are less than twenty-five (25) tons per year and the potential PM10 emissions (assuming PM = PM10) are less than fifteen (15) tons per year after controls. Any change or modification to this either painting spray booth or welding operations that would cause potential Volatile Organic Compound (VOC) emissions to be greater than forty (40) tons per year, potential Particulate Matter (PM) emissions to be greater than twenty-five (25) tons per year or potential PM10 emissions to be greater than fifteen (15) tons per year shall trigger applicability to 326 IAC 2-2 (Prevention of Significant Deterioration) and must be approved by the Office of Air Management (OAM) before such change can occur.
- (c) There are no New Source Performance Standards (40 CFR 60) subject to this facility.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP's) (40 CFR 61, 40 CFR 63) subject to this facility.

Proposed Changes:

The following changes were agreed to and made as the First Minor Modification for this source (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

1. Condition A.1 "General Information" has been changed to be as follows to correct the mailing address:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary metal office products manufacturing operation

Responsible Official: Randy Engler
Source Address: Route 66 East, Cannelton, Indiana 47530
Mailing Address: ~~Route 66 East, Cannelton, Indiana 47530~~ **P.O. Box 5088, Lafayette, Indiana 47903-5088**
SIC Code: 3499
County Location: Perry
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

2. Condition A.2 "Emission Units and Pollution Control Equipment Summary" has been changed to be as follows to add the new equipment from the Lafayette source and to change the stack information for the one (1) patch (grinding) booth:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (1) One (1) file cabinet spray booth, identified as FB, with a maximum capacity of fifteen (15) file cabinets per hour, using a water wash wall as control, exhausting to two (2) stacks (SV-1 and SV-2);
 - (2) One (1) sheet metal spray booth, identified as SB, with a maximum capacity of seventy-five (75) file cabinets per hour, using a water wash wall as control, exhausting to one (1) stack (SV-3);
 - (3) ~~One (1) post office spray booth, identified as POB, with a maximum capacity of fifty (50) file cabinets per hour, using a water wash wall as control, exhausting to one (1) stack (SV-4);~~ **One (1) complete safe painting spray booth, identified as PB, with a maximum capacity of 1.8 file cabinets per hour, using a waterwall spray booth filter as control, exhausting to one (1) stack (SV-8);**
 - (4) One (1) patch (grinding) booth, identified as GB, with a maximum capacity of ten (10) cabinets per day, **using dry filters for Particulate Matter (PM) control, exhausting to one (1) stack (SV-5) indoors;**
 - (5) One (1) glass shot blast for cleaning, identified as BA, using a baghouse as control, exhausting to one (1) stack (SV-6);
 - (6) One (1) mixer for dry and wet insulation (fire proofing) ingredients, identified as MX, with a maximum capacity of 4685 pounds of insulation per hour, exhausting to one (1) stack (SV-7); and
 - (7) TIG and MIG welding stations, identified as WELD, exhausting to one (1) stack (GV-1).
3. The equipment listed in Section D.1 "FACILITY OPERATION CONDITIONS" has been changed to be as follows to add the new equipment from the Lafayette source and to change the stack information for the one (1) patch (grinding) booth:

- (1) One (1) file cabinet spray booth, identified as FB, with a maximum capacity of fifteen (15) file cabinets per hour, using a water wash wall as control, exhausting to two (2) stacks (SV-1 and SV-2);
- (2) One (1) sheet metal spray booth, identified as SB, with a maximum capacity of seventy-five (75) file cabinets per hour, using a water wash wall as control, exhausting to one (1) stack (SV-3);
- (3) ~~One (1) post office spray booth, identified as POB, with a maximum capacity of fifty (50) file cabinets per hour, using a water wash wall as control, exhausting to one (1) stack (SV-4);~~ **One (1) complete safe painting spray booth, identified as PB, with a maximum capacity of 1.8 file cabinets per hour, using a waterwall spray booth filter as control, exhausting to one (1) stack (SV-8);**
- (4) One (1) patch (grinding) booth, identified as GB, with a maximum capacity of ten (10) cabinets per day, **using dry filters for Particulate Matter (PM) control**, exhausting ~~to one (1) stack (SV-5)~~ **indoors;**
- (5) One (1) glass shot blast for cleaning, identified as BA, using a baghouse as control, exhausting to one (1) stack (SV-6);
- (6) One (1) mixer for dry and wet insulation (fire proofing) ingredients, identified as MX, with a maximum capacity of 4685 pounds of insulation per hour, exhausting to one (1) stack (SV-7); and
- (7) TIG and MIG welding stations, identified as WELD, exhausting to one (1) stack (GV-1).

4. Condition D.1.1 "Volatile Organic Compounds" has been changed to be as follows to add an emission limitation for the new spray booth (PB) and to remove the emission limitation for the post office spray booth (POB):

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

- (a) Any change or modification to the ~~three (3)~~ **two (2)** spray booths (FB, ~~and SB and POB~~) or the one (1) mixer (MX) must be approved by the Office of Air Management (OAM) before such change or modification can occur.
- (b) **Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Requirements):**
 - (1) **The one (1) complete safe painting spray booth (PB) shall not cause, allow or permit the discharge into the atmosphere of any Volatile Organic Compound (VOC) in excess of 3.5 pounds per gallons of coating excluding water for air dried coatings.**
 - (2) **Solvent sprayed from application equipment of the one (1) complete safe painting spray booth (PB), during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.**

5. Condition D.1.1a "Volatile Organic Compound" has been added to the permit as follows to state that the one (1) post office spray booth (POB) will not be used further:

D.1.1a Volatile Organic Compound (VOC) [326 IAC 2-2]

The use of the one (1) post office spray booth (POB) shall be permanently discontinued. Any change or modification that would require the use of the one (1) post office spray booth (POB) shall trigger applicability to 326 IAC 2-2 (Prevention of Significant Deterioration) and must be approved by the Office of Air Management before such change or modification can occur.

6. Condition D.1.2 "Particulate Matter" has been changed to be as follows to add an emission limitation for the new spray booth (PB) and to remove the emission limitation for the post office spray booth (POB):

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

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM from the one (1) spray booth (FB), ~~shall not exceed 0.227 pounds per hour, the PM from the one (1) spray booth (SB) shall not exceed 0.174 pounds per hour, the PM from the one (1) spray booth (POB) shall not exceed 0.227 pounds per hour,~~ **the one (1) complete safe painting spray booth (PB)**, the one (1) mixer for dry and wet insulation (fire proofing) ingredients, ~~shall not exceed 7.25 pounds per hour and the PM from the one (1) patch (grinding) booth (GB), the PM from the one (1) glass shot blast for cleaning, and the TIG and MIG welding stations shall not exceed the pound per hour emission rate as 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:

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

7. Condition D.1.4 "Particulate Matter" has been changed to be as follows to add monitoring requirements for the new spray booth (PB) and to remove the monitoring requirements for the post office spray booth (POB):

D.1.4 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2:

- (a) The water wash wall for PM control shall be in operation at all times when the three (3) paint booths (FB, SB and ~~POB~~ **PB**) are in operation.
- (b) The baghouse for PM control shall be in operation at all times when the one (1) glass shot blast is in operation.
- (c) **The dry filters for PM control shall be in operation at all times when the one (1) patch (grinding) booth is in operation.**

8. Condition D.1.5(a) "Visible Emissions Notations" has been changed to be as follows to add monitoring requirements for the new spray booth (PB) and to remove the monitoring requirements for the post office spray booth (POB):

- (a) Daily visible emission notations of the three (3) spray booths (FB, SB and ~~POB~~ **PB**), one (1) patch grinding booth (GB), one (1) glass shot blast for cleaning (BA), one (1) mixer (MX), and the TIG and MIG welding stations (Weld) stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

9. Condition D.1.9 "Record Keeping Requirements" has been changed to be as follows to add record keeping requirements for the new spray booth (PB) and to remove the record keeping requirements for the post office spray booth (POB):

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2 and D.1.6, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of daily visible emission notations of the three (3) spray booths (FB, SB and ~~POB~~ PB), one (1) patch grinding booth (GB), one (1) glass shot blast for cleaning (BA), one (1) mixer (MX), and the TIG and MIG welding stations (Weld) stack exhaust.
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchase orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
- (d) To document compliance with Condition D.1.1(b), 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.**
 - (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.**
- ~~(d)~~**(e)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**Company Name: Schwab Corporation
Address City IN Zip: Route 66 East, Cannelton, Indiana 47530
MMT: MMT123-9837-00018
Pit ID: 123-00018
Reviewer: Catherine Moore
Date: July 2, 1998**

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
PB (W/R Putty Leatherette)	10.5	46.10%	29.8%	16.3%	37.0%	40.50%	0.25000	1.800	2.71	1.70	0.77	18.41	3.36	5.56	4.21	50%
PB (W/R Color)	10.0	51.20%	31.4%	19.8%	37.6%	37.30%	0.66000	1.800	3.17	1.98	2.35	56.45	10.30	12.70	5.31	50%
FB (KB-49)	9.2	52.57%	0.0%	52.6%	0.0%	25.50%	0.20000	15.000	4.83	4.83	14.49	347.85	63.48	28.64	18.95	50%
FB (KB-2973)	8.9	49.90%	0.0%	49.9%	0.0%	26.80%	0.20000	15.000	4.44	4.44	13.32	319.76	58.36	29.29	16.57	50%
FB (KB-52)	9.2	53.80%	0.0%	53.8%	0.0%	24.40%	0.20000	15.000	4.95	4.95	14.85	356.37	65.04	27.93	20.29	50%
FB (KB-51)	8.2	65.34%	0.0%	65.3%	0.0%	19.30%	0.20000	15.000	5.36	5.36	16.07	385.77	70.40	18.67	27.76	50%
FB (KB-50)	9.0	54.10%	0.0%	54.1%	0.0%	24.20%	0.20000	15.000	4.88	4.88	14.64	351.35	64.12	27.20	20.16	50%
SB (KB-49)	9.2	52.27%	0.0%	52.3%	0.0%	25.50%	0.02700	75.000	4.80	4.80	9.73	233.46	42.61	19.45	18.84	50%
SB (KB-2973)	8.9	49.90%	0.0%	49.9%	0.0%	26.80%	0.02700	75.000	4.44	4.44	8.99	215.84	39.39	19.77	16.57	50%
SB (KB-52)	9.2	53.80%	0.0%	53.8%	0.0%	24.40%	0.02700	75.000	4.95	4.95	10.02	240.55	43.90	18.85	20.29	50%
SB (KB-51)	8.2	65.34%	0.0%	65.3%	0.0%	19.30%	0.02700	75.000	5.36	5.36	10.85	260.39	47.52	12.60	27.76	50%
SB (KB-50)	9.0	54.10%	0.0%	54.1%	0.0%	24.20%	0.02700	75.000	4.88	4.88	9.88	237.16	43.28	18.36	20.16	50%

State Potential Emissions

Add worst case coating to all solvents

125.97

3023.35

551.76

239.02

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

HAP Emission Calculations

Company Name: Schwab Corporation
Plant Location: Route 66 East, Cannelton, Indiana 47530
County: Perry
Permit Reviewer: Catherine Moore
Date: July 2, 1998

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Ethylene Glycol	Weight % Formaldehyde	Weight % Ethyl Benzene	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)
PB (W/R Putty Leatherette)	10.5	0.250000	1.80	0.00%	7.10%	0.00%	0.00%	0.00%	0.00	1.47	0.00	0.00	0.00
PB (W/R Color)	10	0.660000	1.80	0.00%	9.30%	0.00%	0.00%	0.00%	0.00	4.84	0.00	0.00	0.00
FB (KB-49)	9.2	0.200000	15.00	27.50%	0.00%	0.10%	3.90%	4.00%	33.24	0.00	0.12	4.71	4.84
FB (KB-2973)	8.9	0.200000	15.00	25.20%	0.00%	0.10%	0.00%	3.40%	29.47	0.00	0.12	0.00	3.98
FB (KB-52)	9.2	0.200000	15.00	28.00%	0.00%	0.10%	3.90%	4.00%	33.85	0.00	0.12	4.71	4.84
FB (KB-51)	8.2	0.200000	15.00	30.40%	0.00%	0.10%	4.80%	5.00%	32.76	0.00	0.11	5.17	5.39
FB (KB-50)	9	0.200000	15.00	28.50%	0.00%	0.10%	4.00%	4.10%	33.70	0.00	0.12	4.73	4.85
SB (KB-49)	9.2	0.027000	75.00	27.50%	0.00%	0.10%	3.90%	4.00%	22.44	0.00	0.08	3.18	3.26
SB (KB-2973)	8.9	0.027000	75.00	25.20%	0.00%	0.10%	0.00%	3.40%	19.89	0.00	0.08	0.00	2.68
SB (KB-52)	9.2	0.027000	75.00	28.00%	0.00%	0.10%	3.90%	4.00%	22.85	0.00	0.08	3.18	3.26
SB (KB-51)	8.2	0.027000	75.00	30.40%	0.00%	0.10%	4.80%	5.00%	22.11	0.00	0.07	3.49	3.64
SB (KB-50)	9	0.027000	75.00	28.50%	0.00%	0.10%	4.00%	4.10%	22.75	0.00	0.08	3.19	3.27

Total State Potential Emissions

273.06 6.31 0.98 32.38 40.00

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
From Welding Operations**

Company Name: Schwab Corporation
Address City IN Zip: Route 66 East, Cannelton, Indiana 47530
MMT: 123-9837-00018
Pit ID: 123-00018
Reviewer: Cathie Moore
Date: August 31, 1998

Type of Welding	Number of Units	Electrode Type	Maximum Wire Consumption per Unit (lbs/hr)	Emission Factors (lb pollutant/lb wire consumed)		Potential Emissions (tons/year)	
				PM	Manganese	PM	Manganese
Metal Inert Gas (MIG)	17.0	Mild Steel	0.750	0.0055	0.0005	0.307	0.028
Tungsten Inert Gas (TIG)	11.0	Mild Steel	0.088	0.0055	0.0005	0.023	0.002
Total Potential Emissions (tons/yr):						0.330	0.030

METHODOLOGY

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

Emission Factors are from the SARA 313 Reporting Guide.