NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Revision to a Federally Enforceable State Operating Permit (FESOP)
for Dragon Products in Fulton County
Significant Permit Revision No.: 049-41897-00008

The Indiana Department of Environmental Management (IDEM) has received an application from Dragon Products, located at 8857 East State Road 14, Akron, Indiana 46910, for a significant revision of its FESOP issued on May 20, 2019. If approved by IDEM’s Office of Air Quality (OAQ), this proposed revision would allow Dragon Products to make certain changes at its existing source. Dragon Products has applied to correct the unit description and flow rate of the grit blasting unit, identified as EU-02. In the FESOP renewal, 049-40635-00008, the grit blasting unit was described as having only one (1) No. 4 nozzle, with an abrasive flow rate of 1,847 pounds per hour. The grit blasting unit, in fact has four (4) No. 7 nozzles, with an abrasive flow rate of 4,624 pounds per hour, per nozzle.

The applicant has constructed and is operating new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). The potential to emit regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

IDEM is aware that the one (1) grit blast booth, consisting of four (4) No. 7 nozzles, identified as EU-02, has been operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take appropriate action. This draft permit contains provisions to bring unpermitted equipment into compliance with operation permit rules.

A copy of the permit application and IDEM’s preliminary findings are available at:

Akron Carnegie Public Library
205 East Rochester Street
Akron, IN 46910

and

IDEM Northern Regional Office
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450
South Bend, IN 46601-1295

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

A copy of the preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC.) Please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when
IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the air pollution impact of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number SPR 049-41897-00008 in all correspondence.

Comments should be sent to:

Paul Jump
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Paul Jump or (317) 234-6555
Or dial directly: (317) 234-6555
Fax: (317) 232-6749 attn: Paul Jump
E-mail: pjjump@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM’s response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM’s decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Paul Jump of my staff at the above address.

[Signature]
Heath Harley, Section Chief
Permits Branch
Office of Air Quality
Mr. Rob Girton  
Dragon Products  
8857 East State Road 14  
Akron, Indiana 46910  

Re: 049-41897-00008  
Significant Revision to  
F049-40635-00008  

Dear Mr. Girton:

        Dragon Products was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F049-40635-00008, on May 20, 2019, for a stationary metal fabricating facility located at 8857 East State Road 14, Akron, Indiana 46910. On September 6, 2019, the Office of Air Quality (OAQ) received an application from the source requesting that the description for the grit blast booth be updated to include four (4) No. 7 nozzles, with an abrasive flow rate of 4,624 pounds per hour, per nozzle. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, the following emission unit is approved for construction at the source:

(a) One (1) grit blast booth, identified as EU-02, constructed in 2004, consisting of four (4) No. 7 nozzles, with a maximum capacity to clean 3,320 pounds of steel per hour, each nozzle has a flow rate of 4,624 pounds abrasive per hour, equipped with a cartridge dust collector, identified as CE-2, for particulate control, and exhausting to Stack S-2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the Significant Permit Revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised.

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. A copy of the permit is also available via IDEM’s Virtual File Cabinet (VFC.) Please go to http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens’ Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
If you have any questions regarding this matter, please contact Paul Jump, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-6555 or (800) 451-6027, and ask for Paul Jump or (317) 234-6555.

Sincerely,

Heath Hartley, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Revised permit and Technical Support Document.

cc: File - Fulton County  
Fulton County Health Department  
U.S. EPA, Region 5  
Compliance and Enforcement Branch  
IDEM Northern Regional Office
Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

Dragon Products
8857 East State Road 14
Akron, Indiana  46910

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. 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. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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 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.

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.

<table>
<thead>
<tr>
<th>Operation Permit No.: F049-40635-00008</th>
<th>Issuance Date: May 20, 2019</th>
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<tbody>
<tr>
<td>Master Agency Interest ID: 12682</td>
<td>Expiration Date: May 20, 2029</td>
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| Issued by: Heath Hartley, Section Chief Permits Branch Office of Air Quality | |

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<th>Issuance Date:</th>
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<tr>
<td>Issued by: Heath Hartley, Section Chief Permits Branch Office of Air Quality</td>
<td>Expiration Date: May 20, 2029</td>
</tr>
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SECTION A  SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). 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 stationary metal fabricating facility.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>8857 East State Road 14, Akron, Indiana 46910</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>(574) 893-1569</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3444 (Sheet Metal Work)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Fulton</td>
</tr>
<tr>
<td>Source Location Status:</td>
<td>Attainment for all criteria pollutants</td>
</tr>
<tr>
<td>Source Status:</td>
<td>Federally Enforceable State Operating Permit Program</td>
</tr>
<tr>
<td></td>
<td>Minor Source, under PSD and Emission Offset Rules</td>
</tr>
<tr>
<td></td>
<td>Minor Source, Section 112 of the Clean Air Act</td>
</tr>
<tr>
<td></td>
<td>Not 1 of 28 Source Categories</td>
</tr>
</tbody>
</table>

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 room, identified as EU-01, constructed in 2004, consisting of two (2) paint booths, each equipped with one (1) airless spray applicator, with a combined maximum capacity to paint 0.625 metal fractionation tanks or 1.25 metal containers per hour, using dry filters (CE-1, CE-3) for particulate control, and exhausting to Stacks S-1 and S-3, respectively.

(b) One (1) grit blast booth, identified as EU-02, constructed in 2004, consisting of four (4) No. 7 nozzles, with a maximum capacity to clean 3,320 pounds of steel per hour, each nozzle has a flow rate of 4,624 pounds abrasive per hour, equipped with a cartridge dust collector, identified as CE-2, for particulate control, and exhausting to Stack S-2.

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:

(a) One (1) welding, cutting, and assembly process, constructed in 2004, with a maximum capacity of 16,000 pounds of steel per hour, exhausting to general ventilation, and consisting of the following equipment:

(1) Fifty-five (55) Metal Inert Gas (MIG) welding stations, identified as W1-W55, each with a maximum capacity to use three (3.0) pounds of wire per station per hour.

(2) Ten (10) oxyacetylene flame-cutting stations, identified as AFC1 - AFC10, each with a maximum capacity to cut 20.0 inches of 0.25 inch thick metal per minute.

(3) One (1) plasma flame-cutting station, identified as PFC1, with a maximum capacity to cut 20.0 inches of 1.00 inch thick metal per minute.

(b) Propane or liquefied petroleum gas, or butane-fired combustion sources with a maximum heat input equal to or less than six million (6,000,000) British thermal units per hour.
(MMBtu/hr), consisting of:

(1) Two (2) space heaters, identified as H-1 and H-2, firing propane gas, with a maximum capacity: 0.1 million British thermal units per hour (MMBtu/hr), each.

(2) One (1) space heater, identified as H-3, firing propane gas, with a maximum capacity: 0.3 million British thermal units per hour (MMBtu/hr).

(c) A petroleum fuel, other than gasoline, dispensing facility, having a total maximum storage capacity of seven thousand seven hundred fifty (7,750) gallons; consisting of:

(1) Two (2) diesel storage tanks, identified as T-3 & T-4; T-3 was constructed in 2003, T-4 was constructed in 2006, each has a maximum storage capacity of two hundred fifty (250) gallons, and each dispenses less than or equal to three hundred twenty (320) gallons per month;

(2) One (1) kerosene storage tank, constructed in 2001, identified as T-1, having a maximum storage capacity of two hundred fifty (250) gallons, and dispensing less than or equal to five hundred fifteen (515) gallons per winter;

(3) Seven (7) LPG pressurized storage tanks, identified as LP-1 - LP-7, four (4) tanks were constructed in 1998 & three (3) tanks were constructed in 2001, each having a maximum storage capacity of one (1) thousand gallons.

(d) Machining where an aqueous cutting coolant continuously floods the machining interface.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(f) Unpaved roads and parking lots with public access.

(g) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

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 Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).
SECTION B  GENERAL CONDITIONS

B.1 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, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F049-40635-00008, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

B.5 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.6 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.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ 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. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
(1) it contains a certification by an "authorized individual", as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(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, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(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, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ 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.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

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; and
3. Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

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

If, due to circumstances beyond the Permittee’s control, the PMPs 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 and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 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 describe 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, OAQ, or Northern Regional Office 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 Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
   Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
   Facsimile Number: 317-233-6865
   Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

5. For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

   Indiana Department of Environmental Management
   Compliance and Enforcement Branch, Office of Air Quality
   100 North Senate Avenue
   MC 61-53 IGCN 1003
   Indianapolis, Indiana 46204-2251

   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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ 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, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance 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.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F049-40635-00008 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or
(b) All previous registrations and permits are superseded by this permit.

B.14 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.15 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 Federally Enforceable State Operating Permit 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)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ 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, OAQ 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, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 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, OAQ 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(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:
(b) A timely renewal application is one that is:

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

2. 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, OAQ on or before the date it is due.

(c) 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, OAQ 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, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement 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.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a 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 2-8-11.1 has been obtained;

3. The changes do not result in emissions which exceed the limitations provided in 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  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region 5  
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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) Emission Trades [326 IAC 2-8-15(b)]

The Permittee may trade emissions increases and decreases at 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(b).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(c)]

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, OAQ or U.S. EPA is required.

(d) 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.19 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, 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) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement 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.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to
whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.
SECTION C  SOURCE OPERATION CONDITIONS

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 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, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month 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 twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) 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.

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

C.3 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,
Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable 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) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

C.8 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.
Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

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

(a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.
C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]  
Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

   (1) initial inspection and evaluation;
   (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
   (3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

   (1) monitoring results;
   (2) review of operation and maintenance procedures and records; and/or
   (3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.14 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 submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. 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 request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(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, OAQ on or before the date it is due.

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

C.17 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 applicable standards for recycling and emissions reduction.
SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) paint room, identified as EU-01, constructed in 2004, consisting of two (2) paint booths, each equipped with one (1) airless spray applicator, with a combined maximum capacity to paint 0.625 metal fractionation tanks or 1.25 metal containers per hour, using dry filters (CE-1, CE-3) for particulate control, and exhausting to Stacks S-1 and S-3, respectively.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

D.1.1 FESOP and HAP Minor Limits [326 IAC 2-8-4][326 IAC 2-4.1][40 CFR 63]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP)) not applicable, the Permittee shall comply with the following:

(a) The input of xylene to paint room (EU-01), shall be limited to 9.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(b) The input of MIBK to paint room (EU-01), shall be limited to 9.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

(c) The input of combined hazardous air pollutants (HAPs) to paint room (EU-01), shall be limited to 24.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit xylene, MIBK and total HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per twelve (12) consecutive month period, total HAPs to less than twenty-five (25) tons per twelve (12) consecutive month period, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), and 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP) not applicable, and this source is an area source of HAP emissions under Section 112 of the Clean Air Act (CAA).

D.1.2 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), for the paint room, EU-01, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.


Pursuant to 326 IAC 8-2-9(f) (Miscellaneous Metal and Plastic Parts Coating Operations), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

(a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when
depositing or removing these materials.

(c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(e) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.1.4 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the paint room (EU-01) shall be controlled using dry particulate filters (CE-1 & CE-3), and the Permittee shall operate the control devices in accordance with manufacturer’s specifications.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for this facility and its control device. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, 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 Particulate Control [326 IAC 2-8-5(a)(4)][326 IAC 2-8-13(c)(7)]

(a) In order to comply with Condition D.1.3, and pursuant to 326 IAC 2-8-13(c)(7), and in order to assure that the requirements of 326 IAC 2-7 and 326 IAC 2-2 (PSD) do not apply, the permittee shall:

(1) Operate the filter systems, identified as CE-1 & CE-3, for particulate control and to control emissions from the paint room (EU-01) at all times when the paint room is in operation and for an additional thirty (30) minutes after each painting job has ceased.

(2) Replace paint booth filters once per week during full production or, during less than full production, whenever the filters become clogged.

(3) Verify the doors to the paint booth are closed at all times when the paint booth is in operation until each painting job has ceased.

Compliance with this requirement, combined with the potential to emit PM, PM2.5 and PM10 from all other emission units at the source, shall assure the PM, PM2.5 and PM10 emissions from the entire source are less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 not applicable.
Compliance Monitoring Requirements [326 IAC 2-8-4(1)] [326 IAC 2-8-5(a)(1)]

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint room, EU-01, stacks (S1 and S3) while one or more of the booths are in operation. If a condition exists which should result in a response, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.9 Operator Training Requirements

The Permittee shall implement an operator-training program.

(a) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained upon issuance of this permit if training was not completed within the last twelve (12) months. All new operators shall be trained within thirty (30) days of hiring or transfer.

(b) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

(c) All operators shall be given refresher training annually.

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

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1(a-c) and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and usage limits and the HAP content and usage limits established in Conditions D.1.1(a-c) and D.1.2.

1. The VOC and HAP content of each coating material and solvent used less water.

2. The amount of coating material and solvent used on monthly basis. (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. (B) Solvent usage records shall differentiate between those added to
coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month.

(4) The total HAP and total single HAP usage, including coating, dilution solvents, and cleaning solvents, for each month and for each compliance period.

(5) The total HAP and total single HAP emitted for each month and each compliance period.

(b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of filter replacements in CE-1 & CE-3.

(c) To document the compliance status with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

(d) To document compliance with Condition D.1.9, the Permittee shall maintain a copy of the operator-training program and training records.

(e) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.1.11 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1(a), D.1.1(b) and D.1.1(c), shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official,” as defined by 326 IAC 2-7-1(35).
SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) One (1) grit blast booth, identified as EU-02, constructed in 2004, consisting of four (4) No. 7 nozzles, with a maximum capacity to clean 3,320 pounds of steel per hour, each nozzle has a flow rate of 4,624 pounds abrasive per hour, equipped with a cartridge dust collector, identified as CE-2, for particulate control, and exhausting to Stack S-2.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

D.2.1 PSD Minor Limits [326 IAC 2-2]
In order to render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM emissions from the shotblasting lines shall comply with the following:

(a) In order to render 326 IAC 2-2 not applicable, the PM emissions after control from the steel shot blaster shall not exceed 0.74 pounds per hour.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), not applicable.

D.2.2 FESOP and PSD Minor Limits [326 IAC 2-2][326 IAC 2-8-4]
Pursuant to 326 IAC 2-8 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM10 and PM2.5 emissions from the shotblasting lines shall comply with the following:

(a) PM_{10} emissions after control from the steel shot blaster shall not exceed 0.64 pounds per hour.

(b) PM_{2.5} emissions after control from the steel shot blaster shall not exceed 0.64 pounds per hour.

Compliance with these limits, combined with the potential to emit PM_{10} and PM_{2.5} from other emission units at this source, shall limit the source-wide total potential to emit of PM_{10} and PM_{2.5} to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.2.3 Particulate [326 IAC 6-3-2]
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the grit blast booth (EU-02) shall not exceed 10.33 pounds per hour when operating at a process weight rate of 7,944 pounds per hour.

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

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

\[ E = 4.10 P^{0.67} \]

where \( E \) = rate of emission in pounds per hour; and
D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for this facility and its control device. Section B - Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.2.5 Particulate Control

(a) In order to assure compliance with Conditions D.2.1, D.2.2 and D.2.3, the cartridge dust collector, identified as CE-2, for particulate control shall be in operation and control emissions from the grit blast booth (EU-02), at all times the grit blast booth is in operation.

(b) Verify the door to the grit blast booth (EU-02) is closed at all times when the booth is in operation.

(c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.2.6 Testing Requirements [326 IAC 2-1.1-11]

Not later than 180 days after the issuance of this permit, 049-41897-00008, the Permittee shall perform PM, PM10, and PM2.5 testing of the grit blast booth (EU-02) utilizing methods approved by the commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

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

D.2.7 Parametric Monitoring

The Permittee shall record the pressure drop across cartridge dust collector, identified as CE-2, at least once per day when the associated grit blast booth (EU-02) is in operation. When, for any one reading, the pressure drop across a baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 and 10.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.2.8 Cartridge Dust Collector Inspections

The Permittee shall perform quarterly inspections of the cartridge dust collector, identified as CE-2, controlling particulate from grit blast booth (EU-02) to verify that they are being operated and maintained in accordance with the manufacturer’s specifications. Inspections required by this condition shall not be performed in consecutive months. All defective cartridges shall be replaced.
D.2.9 Broken or Failed Cartridge Detection

(a) For a single compartment dust collector controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment dust collector controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Cartridge failure can be indicated by a significant drop in the dust collectors’ pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.2.10 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.7, the Permittee shall maintain daily records of pressure drop across the cartridge dust collector, identified as CE-2, stack exhaust. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

(b) To document the compliance status with Condition D.2.8, the Permittee shall maintain records of the dates and results of the inspections.

(c) Section C - General Record Keeping Requirements contains the Permittee’s obligations with regard to the records required by this condition.
Source Name: Dragon Products
Source Address: 8857 East State Road 14, Akron, Indiana 46910
FESOP Permit No.: F049-40635-00008

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:

☐ Annual Compliance Certification Letter
☐ Test Result (specify)___________________________________________________
☐ Report (specify)_______________________________________________________
☐ Notification (specify)__________________________________________________
☐ Affidavit (specify)_____________________________________________________
☐ 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: __________________________
This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-8-12

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

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<td>Permit Condition or Operation Limitation in Permit:</td>
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<td>Description of the Emergency:</td>
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<td>Describe the cause of the Emergency:</td>
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If any of the following are not applicable, mark N/A

| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? | Y | N |
| Describe: |
| Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| 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 QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  

FESOP Quarterly Report

Source Name: Dragon Products  
Source Address: 8857 East State Road 14, Akron, Indiana 46910  
FESOP Permit No.: F049-40635-00008  
Facility: One (1) paint room (EU-01)  
Parameter: MIBK input  
Limit: Less than 9.9 tons of MIBK compounds per twelve (12) consecutive month period, with compliance determined at the end of each month.

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- No deviation occurred in this quarter.
- 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 QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH

FESOP Quarterly Report

Source Name: Dragon Products  
Source Address: 8857 East State Road 14, Akron, Indiana 46910  
FESOP Permit No.: F049-40635-00008  
Facility: One (1) paint room (EU-01)  
Parameter: Xylene input  
Limit: Less than 9.9 tons of Xylene compounds per twelve (12) consecutive month period, with compliance determined at the end of each month.

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☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.  
Deviations has been reported on: __________________________

Submitted by: __________________________  
Title / Position: __________________________  
Signature: __________________________  
Date: __________________________  
Phone: __________________________
Source Name: Dragon Products  
Source Address: 8857 East State Road 14, Akron, Indiana 46910  
FESOP Permit No.: F049-40635-00008  
Facility: One (1) paint room (EU-01)  
Parameter: Total HAP input  
Limit: Less than 24.0 tons of total HAPs per twelve (12) consecutive month period, with compliance determined at the end of each month.

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- □ No deviation occurred in this quarter.
- □ 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 QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Dragon Products
Source Address: 8857 East State Road 14, Akron, Indiana 46910
FESOP Permit No.: F049-40635-00008

Months: ___________ to ____________ Year: ______________

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

- NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
- THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

<table>
<thead>
<tr>
<th>Permit Requirement</th>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
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<td>Response Steps Taken:</td>
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<td>Probable Cause of Deviation:</td>
<td></td>
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<tr>
<td>Response Steps Taken:</td>
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</tr>
</tbody>
</table>

Form Completed by: ____________________________

Title / Position: ____________________________

Date: ____________________________

Phone: ____________________________
Source Description and Location

Source Name: Dragon Products
Source Location: 8857 East State Road 14, Akron, Indiana 46910
County: Fulton
SIC Code: 3444 (Sheet Metal Work)
Operation Permit No.: F 049-40635-00008
Operation Permit Issuance Date: May 20, 2019
Significant Permit Revision No.: 049-41897-00008
Permit Reviewer: Paul Jump

Existing Approvals

The source was issued FESOP Renewal No. 049-40635-00008 on May 20, 2019. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Fulton County.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Unclassifiable or attainment effective November 15, 1990.</td>
</tr>
<tr>
<td>O₃</td>
<td>Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard.¹</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective April 15, 2015, for the annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Unclassifiable effective November 15, 1990.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOₓ) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOₓ emissions are considered when evaluating the rule applicability relating to ozone. Fulton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM₂.₅
Fulton County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOₓ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
(c) Other Criteria Pollutants
Fulton County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

<table>
<thead>
<tr>
<th>Fugitive Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.</td>
</tr>
<tr>
<td>The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Greenhouse Gas (GHG) Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>On June 23, 2014, in the case of Utility Air Regulatory Group v. EPA, cause no. 12-1146, (available at <a href="http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf">http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf</a>) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court’s decision. U.S. EPA’s guidance states that U.S. EPA will no longer require PSD or Title V permits for sources “previously classified as ‘Major’ based solely on greenhouse gas emissions.”</td>
</tr>
<tr>
<td>The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Source Status - Existing Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.</td>
</tr>
</tbody>
</table>
Source-Wide Emissions Prior to Revision (ton/year)

<table>
<thead>
<tr>
<th></th>
<th>PM$^1$</th>
<th>PM$_{10}$$^1$</th>
<th>PM$_{2.5}$$^{1,2}$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^3$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</td>
<td>60.29</td>
<td>55.77</td>
<td>55.77</td>
<td>1.20E-03</td>
<td>0.31</td>
<td>88.55</td>
<td>0.18</td>
<td>&lt;10</td>
<td>24.37</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>10</td>
<td>25</td>
<td></td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>250</td>
<td>--</td>
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<td></td>
</tr>
</tbody>
</table>

1Under the Part 70 Permit program (40 CFR 70), PM$_{10}$ and PM$_{2.5}$, not particulate matter (PM), are each considered as a "regulated air pollutant."
2PM$_{2.5}$ listed is direct PM$_{2.5}$.
3Single highest source-wide HAP
*Fugitive HAP emissions are always included in the source-wide emissions.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

(c) These emissions are based on the TSD of Renewal No. 049-40635-00008, issued on May 20, 2019.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Dragon Products on September 6, 2019, relating to correcting the unit description and flow rate of the grit blasting unit, identified as EU-02. In the FESOP renewal, 049-40635-00008, the grit blasting unit was described as having only one (1) No. 4 nozzle, with an abrasive flow rate of 1,847 pounds per hour. The grit blasting unit, in fact has four (4) No. 7 nozzles, with an abrasive flow rate of 4,624 pounds per hour, per nozzle.

The following emission units were constructed and/or operated without a permit:

(a) One (1) grit blast booth, identified as EU-02, constructed in 2004, consisting of four (4) No. 7 nozzles, with a maximum capacity to clean 3,320 pounds of steel per hour, each nozzle has a flow rate of 4,624 pounds abrasive per hour, equipped with a cartridge dust collector, identified as CE-2, for particulate control, and exhausting to Stack S-2.

Enforcement Issues

IDEM is aware that equipment has been constructed and/or operated prior to receipt of the proper permit. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit and/or operating rules.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.
Permit Level Determination – FESOP Significant Permit Revision

Pursuant to 326 IAC 2-1.1-1(12), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.

<table>
<thead>
<tr>
<th>Process / Emission Unit</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}^1$</th>
<th>SO$_2$</th>
<th>NO$_X$</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP$^2$</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grit Blast Booth / EU-02</td>
<td>324.05</td>
<td>278.69</td>
<td>278.69</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total PTE Before Controls of the New Emission Units:</td>
<td>324.05</td>
<td>278.69</td>
<td>278.69</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<td>-</td>
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</tbody>
</table>

$^1$PM$_{2.5}$ listed is direct PM$_{2.5}$.

$^2$Single highest HAP.

Appendix A of this TSD reflects the detailed potential emissions of the proposed revision.

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves a change in operation, where the potential to emit of any pollutant increases as indicated below with potential to emit greater than or equal to twenty-five (25) tons per year of the following pollutants:

(i) PM, PM$_{10}$, or direct PM$_{2.5}$.

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the after issuance source-wide potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of the revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. If the control equipment has been determined to be integral, the table reflects the potential to emit (PTE) after consideration of the integral control device.
Source-Wide Emissions After Issuance (ton/year)

<table>
<thead>
<tr>
<th></th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP3</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total PTE of Entire</td>
<td>31.17</td>
<td>30.73</td>
<td>30.73</td>
<td>1.20E-03</td>
<td>0.31</td>
<td>88.55</td>
<td>0.18</td>
<td>&lt;10</td>
<td>24.37</td>
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<tr>
<td>Source Excluding</td>
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<tr>
<td>Fugitives*</td>
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<td></td>
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<tr>
<td>Title V Major Source</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
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<tr>
<td>PSD Major Source</td>
<td>250</td>
<td>250</td>
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<td>250</td>
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</tr>
</tbody>
</table>

1. Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant."

2. PM2.5 listed is direct PM2.5.

3. Single highest source-wide HAP: Xylene

*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

The source opted to take PM, PM10, or direct PM2.5 limit(s) in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable to this source. See Technical Support Document (TSD) State Rule Applicability - Entire Source section, 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset), 326 IAC 2-8 (FESOP), for more information regarding the limit(s).

(a) This existing Title V minor stationary source will continue to be minor under 326 IAC 2-7 because the potential to emit criteria pollutants and HAPs from the entire source will continue to be less than or limited to less than the Title V major source threshold levels. Therefore, the source is subject to the provisions of 326 IAC 2-8 (FESOP) and is an area source under Section 112 of the Clean Air Act (CAA).

(b) This existing minor PSD stationary source will continue to be minor under 326 IAC 2-2 because the potential to emit of all PSD regulated pollutants from the entire source will continue to be less than or limited to less than the PSD major source thresholds. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Due to the proposed revision, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

(a) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit for this proposed revision.

Compliance Assurance Monitoring (CAM):

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.
Due to this revision, state rule applicability has been reviewed as follows:

**326 IAC 2-2 (PSD)**
PSD applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

**PSD Minor Source Limit(s)**
In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(a) PM emissions after control from the steel shot blaster shall not exceed 0.74 pounds per hour.
(b) PM$_{10}$ emissions after control from the steel shot blaster shall not exceed 0.64 pounds per hour.
(c) PM$_{2.5}$ emissions after control from the steel shot blaster shall not exceed 0.64 pounds per hour.

Compliance with these limits, combined with the potential to emit PM, PM$_{10}$, and PM$_{2.5}$ from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM$_{10}$, and PM$_{2.5}$ to less than 250 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**
The new emission unit(s) will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**326 IAC 2-8-4 (FESOP)**
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

**FESOP PM$_{10}$ and PM$_{2.5}$ Limit(s)**
Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits), not applicable, the Permittee shall comply with the following:

(a) PM$_{10}$ emissions after control from the steel shot blaster shall not exceed 0.64 pounds per hour.
(b) PM$_{2.5}$ emissions after control from the steel shot blaster shall not exceed 0.64 pounds per hour.

Compliance with these limits, combined with the potential to emit PM$_{10}$ and PM$_{2.5}$ from all other emission units at this source, shall limit the source-wide total potential to emit of PM$_{10}$ and PM$_{2.5}$ to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

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

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(a), this source (located in Fulton County) is not subject to the requirements of 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-1(a), this source (located in Fulton County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

Due to the proposed revision, state rule applicability has been reviewed as follows:

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(a), the requirements of 326 IAC 6-3-2 are applicable to the one (1) grit blast booth EU-02, since it is a manufacturing process not exempted from this rule under 326 IAC 6-3-1(b) and is not subject to a particulate matter limitation that is as stringent as or more stringent than the particulate limitation established in this rule as specified in 326 IAC 6-3-1(c).

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the one (1) grit blast booth, identified as EU-02, shall not exceed 10.33 pounds per hour when operating at a process weight rate of 7,944 pounds per hour (3.97 tons per hour) \(3,320 \text{ lb/hr parts} + 4,624 \text{ lb/hr abrasive}\). The pound per hour limitation was calculated with the following equation:

\[E = 4.10 \times P^{0.67}\]

where \(E = \text{rate of emission in pounds per hour}\) and \(P = \text{process weight rate in tons per hour}\)

The cartridge dust collector, CE-2 shall be in operation at all times the grit blast booth EU-02, is in operation, in order to comply with this limit.

Compliance Determination and Monitoring Requirements

(a) The Compliance Determination Requirements applicable to this revision are as follows:

1. The cartridge dust collector, identified as CE-2, for particulate control shall be in operation and control emissions from the grit blast booth (EU-02), at all times the grit blast booth is in operation.

2. Verify the door to the grit blast booth (EU-02) is closed at all times when the booth is in operation.
Testing Requirements:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Control Device</th>
<th>Timeframe for Initial Testing or Date of Initial Valid Demonstration</th>
<th>Pollutant/Parameter</th>
<th>Frequency of Testing</th>
<th>Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grit Blaster Booth EU-02</td>
<td>Cartridge Dust Collector CE-2</td>
<td>180**</td>
<td>PM, PM₁₀ &amp; PM₂.₅</td>
<td>every 5 years</td>
<td>326 IAC 2-2</td>
</tr>
</tbody>
</table>

** No later than 180 days after issuance of the permit, 049-41897-00008.

(b) The Compliance Monitoring Requirements applicable to this proposed revision are as follows:

<table>
<thead>
<tr>
<th>Control Device</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>CE-2 (cartridge dust collector)</td>
<td>Pressure drop monitoring</td>
<td>Daily</td>
<td>Within normal range of 3 to 10 inches of water, unless a different upper or lower value is established in the most recent compliant stack test</td>
</tr>
<tr>
<td>CE-2 (cartridge dust collector)*</td>
<td>Baghouse Inspections</td>
<td>Quarterly</td>
<td>Verify that it is operated and maintained per manufacturer's specifications</td>
</tr>
</tbody>
</table>

*Due to the nature of this unit and control device and the historical operations, pressure drop monitoring and dust collector inspections are required in order to assure that the control device is continually working properly.

These monitoring conditions are necessary because the cartridge dust collector (CE-2) for the grit blast booth must operate properly to assure compliance with 326 IAC 2-8-4 FESOP and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

Proposed Changes

The following changes listed below are due to the proposed revision. Deleted language appears as strikethrough text and new language appears as bold text:

1. IDEM OAQ added four (4), No. 7 nozzles to the description of the grit blast booth in Section A.2 and Section D.2.

Additional Changes

IDEM, OAQ made additional changes to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

1. IDEM OAQ added FESOP and PSD Minor Limit language to Section D.2 as Condition D.2.1 and D.2.2.

2. For the grit blast booth EU-02, visible emission notations requirements were removed and replaced with pressure drop readings and filter inspections.

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:

***
(b) One (1) grit blast booth, identified as EU-02, constructed in 2004, consisting of four (4) No. 7 nozzles, with a maximum capacity to clean 3,320 pounds of steel per hour, each nozzle has a flow rate of 48,474,624 pounds abrasive per hour, equipped with a cartridge dust collector, identified as CE-2, for particulate control, and exhausting to Stack S-2.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) One (1) grit blast booth, identified as EU-02, constructed in 2004, consisting of four (4) No. 7 nozzles, with a maximum capacity to clean 3,320 pounds of steel per hour, each nozzle has a flow rate of 48,474,624 pounds abrasive per hour, equipped with a cartridge dust collector, identified as CE-2, for particulate control, and exhausting to Stack S-2.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

D.2.1 PSD Minor Limits [326 IAC 2-2]

In order to render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the PM emissions from the shotblasting lines shall comply with the following:

(a) In order to render 326 IAC 2-2 not applicable, the PM emissions after control from the steel shot blaster shall not exceed 0.74 pounds per hour.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), not applicable.

D.2.2 FESOP and PSD Minor Limits [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

(a) PM$_{10}$ emissions after control from the steel shot blaster shall not exceed 0.64 pounds per hour.

(b) PM$_{2.5}$ emissions after control from the steel shot blaster shall not exceed 0.64 pounds per hour.

Compliance with these limits, combined with the potential to emit PM$_{10}$ and PM$_{2.5}$ from other emission units at this source, shall limit the source-wide total potential to emit of PM$_{10}$ and PM$_{2.5}$ to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.2.43 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the grit blast booth (EU-02) shall not exceed 5.7610.33 pounds per hour when operating at a process weight rate of 3,3207,944 pounds per hour.

***
D.2.24 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements [326 IAC 2-8-4(1)]

D.2.35 Particulate Control

(a) In order to assure compliance with Conditions D.2.1, D.2.2 and D.2.3, the cartridge dust collector, identified as CE-2, for particulate control shall be in operation and control emissions from the grit blast booth (EU-02), at all times the grit blast booth is in operation.

D.2.6 Testing Requirements [326 IAC 2-1.1-11]

Not later than 180 days after the issuance of this permit, 049-41897-00008, the Permittee shall perform PM, PM\textsubscript{10}, and PM\textsubscript{2.5} testing of the grit blast booth (EU-02) utilizing methods approved by the commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee’s obligation with regard to the performance testing required by this condition. \( \text{PM}_{10} \) and \( \text{PM}_{2.5} \) includes filterable and condensable PM.

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

D.2.4 Visible Emissions Notations

(a) Visible emission notations of the grit blast booth (EU-02) stack exhaust Stack S-2 shall be performed once per day 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) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C – Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.2.7 Parametric Monitoring

The Permittee shall record the pressure drop across cartridge dust collector, identified as CE-2, at least once per day when the associated grit blast booth (EU-02) is in operation. When, for any one reading, the pressure drop across a baghouse is outside the normal range, the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 3.0 and 10.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
D.2.8 Cartridge Dust Collector Inspections

The Permittee shall perform quarterly inspections of the cartridge dust collector, identified as CE-2, controlling particulate from grit blast booth (EU-02) to verify that they are being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. All defective cartridges shall be replaced.

D.2.59 Broken or Failed Cartridge Detection

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

D.2.60 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.4, D.2.7, the Permittee shall maintain daily records of the visible emission notations of the grit blast booth pressure drop across the cartridge dust collector, identified as CE-2, stack exhaust. The Permittee shall include in its daily record when a visible emission notation pressure drop reading is not taken and the reason for the lack of a visible emission notation pressure drop reading (e.g., the process did not operate that day).

(b) To document the compliance status with Condition D.2.8, the Permittee shall maintain records of the dates and results of the inspections.

(bc) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

Conclusion and Recommendation

Unless otherwise stated, information 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 September 6, 2019.

The operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 049-41897-00008. The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Paul Jump, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-6555 or (800) 451-6027, and ask for Paul Jump or (317) 234-6555.

(b) A copy of the findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: http://www.in.gov/idem/airquality/2356.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.
### Uncontrolled Potential Emissions (tons/year)

<table>
<thead>
<tr>
<th>Emission Units</th>
<th>PM</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;</th>
<th>SO&lt;sub&gt;2&lt;/sub&gt;</th>
<th>NO&lt;sub&gt;x&lt;/sub&gt;</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface Coating (Paint Room EU-01)</td>
<td>217.97</td>
<td>217.97</td>
<td>217.97</td>
<td>0.00</td>
<td>0.00</td>
<td>88.53</td>
<td>0.00</td>
</tr>
<tr>
<td>Abrasive Blasting (Grit Blast Booth EU-02)</td>
<td>324.05</td>
<td>278.69</td>
<td>278.69</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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<td>0.00</td>
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<td>0.02</td>
<td>0.001</td>
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<td>502.79</td>
<td>1.20E-03</td>
<td>0.31</td>
<td>88.55</td>
<td>0.18</td>
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</table>

| Tanks | - | - | - | - | - | 1.00 | - |
| Unpaved Roads | 3.91 | 1.04 | 0.10 | - | - | - | - |
| **Total fugitives** | 3.91 | 1.04 | 0.10 | 0.00 | 0.00 | 0.00 | 0.00 |
| **Total** | 552.06 | 503.84 | 502.90 | 1.20E-03 | 0.31 | 88.55 | 0.18 |

Shaded cells indicate limits

* PM2.5 listed is direct PM2.5
# Appendix A: Emission Calculations
## PTE HAP Summary

**Company Name:** Dragon Products  
**Address City IN Zip:** 8857 East State Road 14, Akron, Indiana 46910  
**Permit No.:** 049-41897-00008  
**Reviewer:** Paul Jump

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Xylene</th>
<th>MIBK</th>
<th>Ethyl Benzene</th>
<th>Methanol</th>
<th>Nickel</th>
<th>Manganese</th>
<th>Chromium</th>
<th>Total HAP</th>
</tr>
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<tbody>
<tr>
<td>Surface Coating (Paint Room EU-01)</td>
<td>32.69</td>
<td>16.85</td>
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<td>1.31E-03</td>
<td>3.94E-03</td>
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<td>-</td>
<td>-</td>
<td>-</td>
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<td>0.00</td>
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<tr>
<td><strong>Individual HAP Total</strong></td>
<td>32.69</td>
<td>16.85</td>
<td>5.56</td>
<td>0.05</td>
<td>0.37</td>
<td>1.31E-03</td>
<td>3.94E-03</td>
<td>55.16</td>
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</table>

Shaded cells indicate limits

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Xylene</th>
<th>MIBK</th>
<th>Ethyl Benzene</th>
<th>Methanol</th>
<th>Nickel</th>
<th>Manganese</th>
<th>Chromium</th>
<th>Total HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface Coating (Paint Room EU-01)</td>
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<td>&lt;9.9</td>
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<td>Abrasive Blasting (Grit Blast Booth EU-02)</td>
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<td>-</td>
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<td>0.00</td>
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<td>3.94E-03</td>
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<tr>
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<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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<tr>
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<td>3.94E-03</td>
<td>24.373176</td>
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</table>

Shaded cells indicate limits
### Emission Calculations

#### Modification Summary

- **Company Name:** Dragon Products
- **Address City IN Zip:** 8857 East State Road 14, Akron, Indiana 46910
- **Permit No.:** 049-41897-00008
- **Reviewer:** Paul Jump

#### Uncontrolled Potential Emissions (tons/year)

<table>
<thead>
<tr>
<th>Emission Units</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}^*$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abrasive Blasting (Grit Blast Booth EU-02)</td>
<td>324.05</td>
<td>278.69</td>
<td>278.69</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Total</td>
<td>324.05</td>
<td>278.69</td>
<td>278.69</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
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</tbody>
</table>

#### Potential to Emit after Control (tons/year)

<table>
<thead>
<tr>
<th>Emission Units</th>
<th>PM</th>
<th>PM$_{10}$</th>
<th>PM$_{2.5}^*$</th>
<th>SO$_2$</th>
<th>NO$_x$</th>
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<tr>
<td>Total</td>
<td>3.24</td>
<td>2.79</td>
<td>2.79</td>
<td>-</td>
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<td>-</td>
</tr>
</tbody>
</table>

*PM$_{2.5}^*$ listed is direct PM$_{2.5}$*
### Appendix A: Emission Calculations

#### Surface Coating VOC/PM

**Company Name:** Dragon Products  
**Address:** 8857 East State Road 14, Akron, Indiana 46910  
**Permit No.:** 049-41897-00008  
**Reviewer:** Paul Jump

<table>
<thead>
<tr>
<th>CONTAINERS</th>
<th>Density (lb/gal)</th>
<th>Weight % Volatile (VOC &amp; Organics)</th>
<th>Weight % Water</th>
<th>Weight % Organics</th>
<th>Volume % Water</th>
<th>Volume % Non-Volatiles (solids)</th>
<th>Gal of Mat (gal/unit)</th>
<th>Maximum VOC per gallon of coating (lb/unit)</th>
<th>Pounds VOC per gallon of coating</th>
<th>Pounds VOC per gallon of coating less water</th>
<th>Potential VOC pounds per hour</th>
<th>Potential VOC (ton/yr)</th>
<th>Potential Particulate (ton/yr)</th>
<th>Particulate Potential (ton/yr)</th>
<th>9% VOCsolids</th>
<th>Transfer Efficiency</th>
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<tbody>
<tr>
<td><strong>CARBOTHANE 8845 SELF PRIMING TOPCOAT</strong></td>
<td></td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>Carbothane 8845 Part A</td>
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<td>17.80</td>
<td>0.00</td>
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<td>1.26</td>
<td>2.16</td>
<td>10.23</td>
<td>350.61</td>
<td>71.10</td>
<td>82.09</td>
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<td>1.46</td>
<td>3.64</td>
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<td>75%</td>
<td></td>
</tr>
</tbody>
</table>

| FRAC TANKS | | | | | | | | | | | | | | | |
| #7960 Undercoating | 8.40 | 50.00 | 49.50 | 0.50 | 0.00 | 50.00 | 5.000 | 0.625 | 0.05 | 0.05 | 0.15 | 3.53 | 0.64 | 16.08 | 0.09 | 75% |

| PHENOLINE 310 SELF PRIMING | | | | | | | | | | | | | | | |
| Phenoline 310 Part A | 10.42 | 0.96 | 0.00 | 0.96 | 0.00 | 99.00 | 22.500 | 0.625 | 0.11 | 0.11 | 1.53 | 36.77 | 6.71 | 173.09 | 0.11 | 75% |
| Phenoline 310 Part B | 8.85 | 1.13 | 0.00 | 1.13 | 0.00 | 99.00 | 7.500 | 0.625 | 0.10 | 0.10 | 0.47 | 11.27 | 2.06 | 44.89 | 0.10 | 75% |
| As Applied | 10.42 | 1.00 | 0.00 | 1.00 | 0.00 | 99.80 | 30.000 | 0.625 | 0.10 | 0.10 | 1.89 | 45.29 | 8.27 | 217.97 | 0.10 | 75% |

| CARBOTHANE 8845 SELF PRIMING | | | | | | | | | | | | | | | |
| Carbothane 8845 Part A | 12.16 | 17.80 | 0.00 | 17.80 | 0.00 | 88.20 | 11.250 | 0.625 | 2.16 | 2.16 | 15.22 | 365.26 | 66.66 | 76.96 | 3.10 | 75% |
| Urethane Converter 8845-M | 9.11 | 16.00 | 0.00 | 16.00 | 0.00 | 84.00 | 3.750 | 0.625 | 1.46 | 1.46 | 3.42 | 81.99 | 14.96 | 19.64 | 1.83 | 75% |
| As Applied | 11.55 | 17.50 | 0.00 | 17.50 | 0.00 | 81.80 | 15.000 | 0.625 | 2.02 | 2.02 | 18.95 | 454.78 | 83.00 | 97.82 | 2.82 | 75% |

| PHENOLINE 380 SELF PRIMING | | | | | | | | | | | | | | | |
| Phenoline 380 Part A | 11.35 | 0.96 | 0.00 | 0.96 | 0.00 | 99.00 | 22.500 | 0.625 | 0.10 | 0.10 | 1.53 | 36.77 | 6.71 | 173.09 | 0.11 | 75% |
| Phenoline 380 Part B | 8.85 | 1.13 | 0.00 | 1.13 | 0.00 | 99.00 | 7.500 | 0.625 | 0.10 | 0.10 | 0.47 | 11.27 | 2.06 | 44.89 | 0.10 | 75% |
| As Applied | 10.72 | 1.00 | 0.00 | 1.00 | 0.00 | 99.80 | 30.000 | 0.625 | 0.11 | 0.11 | 2.02 | 48.40 | 8.83 | 217.97 | 0.11 | 75% |

| CHASSIS | | | | | | | | | | | | | | | |
| Macropoxy 646 Part A | 12.19 | 17.40 | 0.00 | 17.40 | 0.00 | 82.60 | 6.000 | 0.500 | 2.12 | 2.12 | 9.96 | 252.72 | 27.67 | 33.68 | 2.02 | 75% |
| Macropoxy 646 Part B | 13.68 | 12.00 | 0.00 | 12.00 | 0.00 | 88.00 | 6.000 | 0.625 | 1.64 | 1.64 | 4.95 | 118.23 | 21.48 | 33.82 | 2.17 | 75% |
| As Applied | 12.83 | 14.80 | 0.00 | 14.80 | 0.00 | 85.20 | 12.000 | 0.625 | 1.90 | 1.90 | 11.39 | 273.33 | 49.88 | 71.79 | 2.84 | 75% |

| CLEANERS | | | | | | | | | | | | | | | |
| Acetone | 7.26 | 100.00 | 0.00 | 100.00 | 0.00 | 0.00 | 0.250 | 0.625 | 7.26 | 7.26 | 1.13 | 27.23 | 4.97 | N/A | N/A | N/A |

#### Notes:

- Worst-case coating is the one that yields the highest PTE assuming 100% usage of each product on the appropriate products.
- Paint Rooms EU-01 consists of 2 separate paint booths, each equipped with 1 airless spray applicator (assume 75% control efficiency).
- Each paint booth is equipped with its own set of dry filters for PM emission control (assume 90% control efficiency).
- Acetone is the only cleaning solvent used. It is considered a VOC-exempt material and its PTE (4.97 ton/yr) is not counted in the VOC PTE calculations.

#### Methodology:

- Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- Total = Worst Coating + Sum of all solvents used

**Total Potential Emissions**

Add worst case coating to all solvents

<table>
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<tr>
<th>VOC Control Efficiency: 0.00%</th>
<th>PM Control Efficiency: 90.00%</th>
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</thead>
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</tr>
<tr>
<td>Controlled PTE</td>
<td>18.95</td>
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**VOC (tpy) PM (tpy)**

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<th>Controlled PTE</th>
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<tr>
<td>18.95</td>
<td>454.78</td>
<td>88.53</td>
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## Appendix A: Emission Calculations

### Surface Coating HAPs

**Company Name:** Dragon Products  
**Address City IN Zip:** 8857 East State Road 14, Akron, Indiana 46910  
**Permit No.:** 049-41897-00008  
**Reviewer:** Paul Jump

### Material Density

<table>
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<tr>
<th>Material</th>
<th>Density (lb/gal)</th>
<th>Gallons of Material (gal/unit)</th>
<th>Maximum (unit/hr)</th>
<th>Weight % Xylene</th>
<th>Weight % MIBK</th>
<th>Weight % Ethyl Benzene</th>
<th>Weight % Methanol</th>
<th>Xylene Emissions (ton/yr)</th>
<th>MIBK Emissions (ton/yr)</th>
<th>Ethyl Benzene Emissions (ton/yr)</th>
<th>Methanol Emissions (ton/yr)</th>
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**Total Potential Emissions**

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<tr>
<th></th>
<th>Xylene</th>
<th>MIBK</th>
<th>Ethyl Benzene</th>
<th>Methanol</th>
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<tr>
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<td>32.69</td>
<td>16.85</td>
<td>5.56</td>
<td>0.05</td>
</tr>
</tbody>
</table>

**Methodology:**

HAPs emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2
Appendix A: Emission Calculations

Abrasives Blasting - Confined

Company Name: Dragon Products
Address City IN Zip: 8857 East State Road 14, Akron, Indiana 46910
Permit No.: 049-41897-00008
Reviewer: Paul Jump

Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>lb PM / lb abrasive</th>
<th>lb PM10 / lb PM</th>
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</thead>
<tbody>
<tr>
<td>Sand</td>
<td>0.041</td>
<td>0.70</td>
</tr>
<tr>
<td>Grit</td>
<td>0.010</td>
<td>0.70</td>
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<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
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<tr>
<td>Other</td>
<td>0.010</td>
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Table 2 - Density of Abrasives (lb/ft³)

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<thead>
<tr>
<th>Abrasive</th>
<th>Density (lb/ft³)</th>
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<tbody>
<tr>
<td>Al oxides</td>
<td>160</td>
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<tr>
<td>Sand</td>
<td>99</td>
</tr>
<tr>
<td>Steel</td>
<td>487</td>
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</table>

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

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<tr>
<th>Nozzle Type (diameter)</th>
<th>Internal diameter, in</th>
<th>Nozzle Pressure (psig)</th>
<th>No. 2 (1/8 inch)</th>
<th>No. 3 (3/16 inch)</th>
<th>No. 4 (1/4 inch)</th>
<th>No. 5 (5/16 inch)</th>
<th>No. 6 (7/32 inch)</th>
<th>No. 7 (9/32 inch)</th>
<th>No. 8 (1/2 inch)</th>
<th>No. 10 (9/16 inch)</th>
<th>No. 12 (5/8 inch)</th>
<th>No. 16 (1 inch)</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.125</td>
<td>0.1875</td>
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<td>462</td>
<td>657</td>
<td>770</td>
<td>1160</td>
<td>1850</td>
<td>2880</td>
<td>6000</td>
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Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) of abrasive at nozzle pressure and internal nozzle diameter (ID)

D1 = Density of sand from Table 2 = 99 lb/ft³
ID1 = Internal diameter of nozzle for sand blasting from Table 3 = 0.4375 inch
FR1 = Sand flow rate at nozzle pressure and internal diameter (ID1) from Table 3 = 940 lb/hr

D = Density of actual abrasive = 487 lb/ft³
ID = Internal diameter of actual nozzle = 0.4375 inch
FR = Flow rate of actual abrasive (lb/hr) = 4624.0 lb/hr (per nozzle)

Potential to Emit Before Control

FR = Flow rate of actual abrasive (lb/hr) = 4624.0 lb/hr (per nozzle)
w = fraction of time of wet blasting = 0%
N = number of nozzles = 4
EF = PM emission factor for actual abrasive from Table 1 = 0.004 lb PM/lb abrasive
PM10 emission factor ratio for actual abrasive from Table 1 = 0.86 lb PM10/lb PM

Potential to Emit (before control) = FR x EF x (1 - w/200) x N

Potential to Emit (after control) = Potential to Emit (before control) x [1 - control efficiency]

Potential to Emit (tons/year) = Potential to Emit (lbs/hour) x [8760 hours/year] x [ton/2000 lbs]

Methodology

PM2.5 emissions assumed equal to PM10 emissions.


Flow rate of actual abrasive (FR) (lb/hr) = FR1 x (ID/ID1)² x D1/D

Potential to Emit (before control) = EF x FR x (1 - w/200) x N

Potential to Emit (after control) = [Potential to Emit (before control)] x [1 - control efficiency]

Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]
Appendix A: Emission Calculations

Welding

Company Name: Dragon Products
Address City IN Zip: 8857 East State Road 14, Akron, Indiana 46910
Permit No.: 049-41897-00008
Reviewer: Paul Jump

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<tr>
<th>PROCESS</th>
<th>Number of Stations</th>
<th>Max. electrode consumption per station (lbs/hr)</th>
<th>Max. electrode consumption per station (lbs/day)</th>
<th>EMISION FACTORS* (lb pollutant/lb electrode)</th>
<th>EMISSIONS (lbs/hr)</th>
<th>HAPS (lbs/hr)</th>
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<tbody>
<tr>
<td>WELDING</td>
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<td>PM = PM10 Mn Ni Cr</td>
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<tr>
<td>Metal Inert Gas (MIG)(carbon steel)</td>
<td>55</td>
<td>3</td>
<td>3,960</td>
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<td>0.0005</td>
<td>0.908</td>
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<table>
<thead>
<tr>
<th>FLAME CUTTING</th>
<th>Number of Stations</th>
<th>Max. Metal Thickness Cut (in.)</th>
<th>Max. Metal Cutting Rate (in./minute)</th>
<th>EMISSION FACTORS (lb pollutant/1,000 inches cut, 1&quot; thick)**</th>
<th>EMISSIONS (lbs/hr)</th>
<th>HAPS (lbs/hr)</th>
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<tbody>
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<td>Oxyacetylene</td>
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</tbody>
</table>

EMISSION TOTALS
Potential Emissions lbs/hr | 1.40 | 0.08 | 0.00 | 0.00 | 0.09
Potential Emissions lbs/day | 33.57 | 2.02 | 0.01 | 0.02 | 2.04
Potential Emissions tons/yr | 6.13 | 0.37 | 0.00 | 0.00 | 0.37

Notes:
Maximum Electrode Consumption per Station is calculated based upon estimated worst-case annual welding wire consumption. Welding Operations consist of a maximum of 55 MIG welding stations. There are no emission controls in place.

Methodology:
*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.
Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick
Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)/(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)
Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)/(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lb/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.
# Appendix A: Emission Calculations

## Propane Heaters

Company Name: Dragon Products  
Address City IN Zip: 8857 East State Road 14, Akron, Indiana 46910  
Permit No.: 049-41897-00008  
Reviewer: Paul Jump

### Space heaters

<table>
<thead>
<tr>
<th>Unit</th>
<th>Capacity (MMBtu/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>H-1</td>
<td>0.10</td>
</tr>
<tr>
<td>H-2</td>
<td>0.10</td>
</tr>
<tr>
<td>H-3</td>
<td>0.30</td>
</tr>
</tbody>
</table>

### Maximum Combined Heat Input Capacity (MMBtu/hr)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/kgal</th>
<th>Potential Emissions in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>0.20000</td>
<td>0.00</td>
</tr>
<tr>
<td>PM10*</td>
<td>0.70000</td>
<td>0.02</td>
</tr>
<tr>
<td>direct PM2.5**</td>
<td>0.70000</td>
<td>0.02</td>
</tr>
<tr>
<td>SO2</td>
<td>0.05000</td>
<td>0.001</td>
</tr>
<tr>
<td>NOx</td>
<td>13.00000</td>
<td>0.31</td>
</tr>
<tr>
<td>VOC</td>
<td>1.00000</td>
<td>0.02</td>
</tr>
<tr>
<td>CO</td>
<td>7.50000</td>
<td>0.18</td>
</tr>
</tbody>
</table>

**Notes:**

- PM emission factor is filterable PM only. PM emissions are stated to be all less than 10 microns in aerodynamic equivalent diameter, footnote in Table 1.5-1, therefore PM10 is based on the filterable and condensable PM emission factors.
- ** No direct PM2.5 emission factor was given. Direct PM2.5 is a subset of PM10. If one assumes all PM10 to be all direct PM2.5, then a worst case assumption of direct PM2.5 can be made.
- **The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.
- HAP emissions are assumed to be negligible for LPG combustion.
- 1 gallon of LPG has a heating value of 94,000 Btu
- 1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)

(Source - AP-42 (Supplement B 10/96) page 1.5-1)

### Methodology

Potential Throughput (kgals/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 gallon per 1000 gallon x 1 gal per 0.0915 MMBtu  
Emission Factors are from AP42 (7/08), Table 1.5-1 (SCC #1-02-010-02)  
Propane Emission Factors shown. Please see AP-42 for butane.

Emission (tons/yr) = Throughput (kgals/yr) x Emission Factor (lb/kgal) / 2,000 lb/ton
Appendix A: Emission Calculations

Fugitive Dust Emissions - Unpaved Roads

Company Name: Dragon Products
Address City IN Zip: 8857 East State Road 14, Akron, Indiana 46910
Permit No.: 049-41897-00008
Reviewer: Paul Jump

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight Loaded (ton/trip)</th>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum one-way distance (feet/trip)</th>
<th>Maximum one-way distance (miles/day)</th>
<th>Maximum one-way distance (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Passenger vehicles (entering plant)</td>
<td>65.0</td>
<td>1.0</td>
<td>65.0</td>
<td>2.5</td>
<td>182.5</td>
<td>200</td>
<td>0.038</td>
<td>2.5</td>
</tr>
<tr>
<td>Passenger vehicles (leaving plant)</td>
<td>65.0</td>
<td>1.0</td>
<td>65.0</td>
<td>2.5</td>
<td>182.5</td>
<td>200</td>
<td>0.038</td>
<td>2.5</td>
</tr>
<tr>
<td>Trucks (entering plant)</td>
<td>10.0</td>
<td>1.0</td>
<td>10.0</td>
<td>20.0</td>
<td>200</td>
<td>1000</td>
<td>0.189</td>
<td>1.9</td>
</tr>
<tr>
<td>Trucks (leaving plant)</td>
<td>10.0</td>
<td>1.0</td>
<td>10.0</td>
<td>20.0</td>
<td>200</td>
<td>1000</td>
<td>0.189</td>
<td>1.9</td>
</tr>
</tbody>
</table>

| Totals                                    | 150.0                      | 725.0                                      | 8.7                             | 3179.9                           |

Average Vehicle Weight Per Trip = 4.8 tons/trip
Average Miles Per Trip = 0.06 miles/trip

Unmitigated Emission Factor, $E_f = k\times(s/12)^a\times(W/3)^b$ (Equation 1a from AP-42 13.2.2)

where
- $k = 4.9$ PM, 1.5 PM10, 0.15 PM2.5
- $a = 0.7$ PM, 0.9 PM10, 0.9 PM2.5
- $s = 6.0$ PM, 6.0 PM10, 6.0 PM2.5
- $W = 4.8$ tons
- $b = 0.45$ PM, 0.45 PM10, 0.45 PM2.5

PM = Particulate Matter, PM10 = Particulate Matter (<10 um), PM2.5 = Particulate Matter (<2.5 um)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E\times(365 - P)/365$ (Equation 2 from AP-42 13.2.2)

where $P = 125$ days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

Mitigated Emission Factor, $E_{ext} = 2.46$ PM, 0.66 PM10, 0.07 PM2.5

Process

<table>
<thead>
<tr>
<th>Type</th>
<th>Mitigated PTE of PM (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM10 (Before Control) (tons/yr)</th>
<th>Mitigated PTE of PM2.5 (Before Control) (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Passenger vehicles (entering plant)</td>
<td>1.10</td>
<td>0.29</td>
<td>0.03</td>
</tr>
<tr>
<td>Passenger vehicles (leaving plant)</td>
<td>1.10</td>
<td>0.29</td>
<td>0.03</td>
</tr>
<tr>
<td>Trucks (entering plant)</td>
<td>0.85</td>
<td>0.23</td>
<td>0.02</td>
</tr>
<tr>
<td>Trucks (leaving plant)</td>
<td>0.85</td>
<td>0.23</td>
<td>0.02</td>
</tr>
</tbody>
</table>

| Totals                                    | 3.91                                          | 0.94                                             | 0.10                                          |

Methodology

- $\text{Total Weight driven per day (ton/day)} = \left(\text{Maximum Weight Loaded (ton/trip)}\right)\times\left(\text{Maximum trips per day (trip/day)}\right)$
- $\text{Maximum one-way distance (miles/day)} = \left(\text{Maximum one-way distance (feet/trip)}\right)/\left(5280 \text{ ft/mile}\right)$
- $\text{Maximum one-way miles (miles/day)} = \left(\text{Maximum one-way distance (miles/day)}\right)\times\left(\text{Maximum trips per day (trip/day)}\right)$
- $\text{Average Miles Per Trip} = \left(\text{SUM(Mean one-way distance (miles/day))}/\text{SUM(Maximum trips per day (trip/day))}\right)$
- $\text{Mitigated PTE (Before Control) (tons/yr)} = \left(\text{Maximum one-way miles (miles/yr)}\right)\times\left(\text{Mitigated Emission Factor (lb/mile)}\right)/\left(2000 \text{ lbs}\right)$
- $\text{Mitigated PTE (After Control) (tons/yr)} = \left(\text{Mitigated PTE (Before Control) (tons/yr)}\right)\times(1 - \text{Dust Control Efficiency})$

Abbreviations

- PM = Particulate Matter
- PM10 = Particulate Matter (<10 um)
- PM2.5 = Particulate Matter (<2.5 um)
- PTE = Potential to Emit
October 30, 2019

Rob Girton
Dragon Products
8857 E SR 14
Akron, IN 46910

Re: Public Notice
Dragon Products
Permit Level: FESOP Sig Permit Rev Minor PSD
Permit Number: 049-41897-00008

Dear Mr. Girton:

Enclosed is a copy of your draft FESOP Significant Permit Revision Minor PSD, Technical Support Document, emission calculations, and the Public Notice.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/5474.htm

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the Akron Carnegie Public Library, 205 East Rochester Street in Akron, IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Paul Jump, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-6555 or dial (317) 234-6555.

Sincerely,

Theresa Weaver
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 4/12/19
October 30, 2019

To: Akron Carnegie Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

Subject: Important Information to Display Regarding a Public Notice for an Air Permit

Applicant Name: Dragon Products
 Permit Number: 049-41897-00008

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

• Notice of a 30-day Period for Public Comment
• Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. Please make this information readily available until you receive a copy of the final package.

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019
Notice of Public Comment

October 30, 2019
Dragon Products
049-41897-00008

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/5474.htm.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana’s Air Permitting Program.

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.

Enclosure
PN AAA Cover Letter 4/12/2019
AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

October 30, 2019

A 30-day public comment period has been initiated for:

Permit Number: 049-41897-00008
Applicant Name: Dragon Products
Location: Akron, Fulton County, Indiana

The public notice, draft permit and technical support documents can be accessed via the IDEM Air Permits Online site at:
http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.
# Mail Code 61-53

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<td>Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204</td>
<td>CERTIFICATE OF MAILING ONLY</td>
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### Line | Article Number | Name, Address, Street and Post Office Address |
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<td>1</td>
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<td>Rob Girton Dragon Products 8857 E SR 14 Akron IN 46910 (Source CAATS)</td>
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<td>2</td>
<td></td>
<td>Doug Fierce Chief Operating Officer (COO) Dragon Products 1655 Louisiana St Beaumont TX 77701 (RO CAATS)</td>
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<td>Fulton County Commissioners 1093 E 600 N Rochester IN 46975 (Local Official)</td>
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<td>Fulton County Health Department 125 E 9th Street #125 Rochester IN 46975-7119 (Health Department)</td>
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<td>Akron Town Council 208 W. Rochester Akron IN 46910 (Local Official)</td>
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<td>Akron Carnegie Public Library 205 E Rochester St., PO BOX 428 Akron IN 46910 (Library)</td>
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<td>Mr. Richard &amp; Marjory Ludwig 1215 Madison Rochester IN 46995 (Affected Party)</td>
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<td>Mr. Dennis Grinstead 3086 E. St. Rd. 14 Akron IN 46910 (Affected Party)</td>
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<td>Mrs. Jill &amp; Douglass Sampsel 748 S. 900 E. Akron IN 46910 (Affected Party)</td>
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<tr>
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<td>Mr. Steve Bell 1501 S. 875 E. Akron IN 46910 (Affected Party)</td>
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<td>Shane Blair 822 Main St Rochester IN 46975 (Affected Party)</td>
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<td>Christina Seiler The Rochester Sentinel PO Box 260 Rochester IN 46975 (Affected Party)</td>
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<td>Joe VanCamp  BCA Environmental Consultants, LLC 439 Water Street Kendallville IN 46755 (Consultant)</td>
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