NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a Significant Revision to a Federally Enforceable State Operating Permit (FESOP) for QuikCut, Inc. in Allen County

Significant Permit Revision No.: 003-41876-00289

The Indiana Department of Environmental Management (IDEM) has received an application from QuikCut, Inc., located at 4630 Allen Martin Drive, Fort Wayne, Indiana 46806, for a significant revision of its FESOP issued on July 31, 2014. If approved by IDEM’s Office of Air Quality (OAQ), this proposed revision would allow QuikCut, Inc. to make certain changes at its existing source. QuikCut, Inc. has applied to add one (1) abrasive blaster which was constructed in 2012.

The applicant intends to construct and operate 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 abrasive blaster has been constructed and 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 construction and operation permit rules.

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

Allen County Public Library
900 Library Plaza
Fort Wayne, IN 46802

A copy of the preliminary findings is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](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/](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](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 003-41876-00289 in all correspondence.

Comments should be sent to:

Hachem Ismail Alawi
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Hachem Ismail Alawi or (317) 232-2827
Or dial directy: (317) 232-2827
Fax: (317) 232-6749 attn: Hachem Ismail Alawi
E-mail: HIAIawi@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, 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 Hachem Ismail Alawi of my staff at the above address.

[Signature]

Iryn Cailung, Section Chief
Permits Branch
Office of Air Quality
Mr. Brian D. Swing  
QuikCut, Inc.  
4630 Allen Martin Drive  
Fort Wayne, IN 46806

Re: 003-41876-00289  
Significant Revision to  
F003-34222-00289

Dear Mr. Swing:

QuikCut, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F003-34222-00289, on July 31, 2014, for a stationary large metal storage container manufacturing source located at 4630 Allen Martin Drive, Fort Wayne, Indiana 46806. On September 3, 2019, the Office of Air Quality (OAQ) received an application from the source requesting to add one (1) Abrasive Blaster that was constructed and began operation in 2012. 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:

(b) One (1) abrasive blaster, constructed in 2012, with a maximum capacity of 1160 pounds per hour per nozzle, using Torit Downflo as control, and exhausting indoors.

The following construction conditions are applicable to the proposed project:

**General Construction Conditions**

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

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

**Effective Date of the Permit**

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

**Commenced Construction**

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 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. The permit references the below-listed attachment(s). Since this attachment has been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of this attachment with this revision:

Attachment A: 40 CFR 63, Subpart XXXXXX, Nine Metal Fabrication and Finishing Source Categories

Previously issued approvals for this source containing this attachment are available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

Previously issued approvals for this source are 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.


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 Hachem Ismaili Alaoui, 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) 232-2827 or (800) 451-6027, and ask for Hachem Ismaili Alaoui or (317) 232-2827.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Revised permit and Technical Support Document.

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

QuikCut, Inc.
4630 Allen Martin Drive
Fort Wayne, Indiana 46806

(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.: 003-34222-00289</th>
<th>Issuance Date: July 31, 2014</th>
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<tbody>
<tr>
<td>Master Agency Interest ID: 6343</td>
<td>Expiration Date: July 31, 2024</td>
</tr>
<tr>
<td>Original Signed/Issued by:</td>
<td></td>
</tr>
<tr>
<td>Iryn Calilung, Section Chief</td>
<td></td>
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<tr>
<td>Permits Branch</td>
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<td>Office of Air Quality</td>
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<thead>
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<th>Significant Permit Revision No.: 003-41876-00289</th>
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<tbody>
<tr>
<td>Issued by:</td>
</tr>
<tr>
<td>Iryn Calilung, Section Chief</td>
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<tr>
<td>Permits Branch</td>
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In order to render the requirements of 326 IAC 2-4.1 not applicable and pursuant to
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In order to render the requirements of 326 IAC 2-2 (PSD) not applicable and pursuant
to 326 IAC 2-8-4, the input of VOC, including coatings, dilution solvents and
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Attachment A: NESHAP Subpart XXXXXX
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 large metal storage container manufacturing source.

<table>
<thead>
<tr>
<th>Source Address:</th>
<th>4630 Allen Martin Drive, Fort Wayne, Indiana 46806</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Source Phone Number:</td>
<td>(260) 447-3880</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3499 (Fabricated Metal Products, NEC)</td>
</tr>
<tr>
<td>County Location:</td>
<td>Allen</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 Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories</td>
</tr>
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</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) spray coating booth, identified as EU-01, constructed in 2003, with a maximum capacity of 1.25 metal containers per hour, equipped with high volume low pressure (HVLP) spray guns, using dry filters for overspray as control, and exhausting to stack 01.

(b) One (1) abrasive blaster, constructed in 2012, with a maximum capacity of 1160 pounds per hour per nozzle, using a baghouse as control, identified as Torit Downflo, and exhausting indoors.

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) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour, including but not limited to eight (8) heaters with a capacity of 0.25 million British thermal units per hour, each [326 IAC 2-7-1(21)(J)(i)(AA)(aa)].

(b) Equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 2-7-1(21)(J)(vi)(EE)], including the following:

(1) Sixteen (16) metal inert gas welding stations, capacity: 3.5 pounds of wire per hour per welder.

(2) One (1) portable stick welding station, capacity: 1.0 electrode per hour.

(3) One (1) tungsten inert gas welding station, capacity: 1.0 pound of metal per hour.

(4) One (1) plasma cutting station, capacity: 12 inches of metal per minute, 0.75 inches thick.
(5) One (1) laser cutter, capacity: 30 inches of metal per minute, 0.75 inches thick.

Under NESHAP Subpart XXXXXX, this is considered an existing affected facility.

(c) Any of the following structural steel and bridge fabrication activities:

Cutting 200,000 linear feet or less of one (1) inch plate or equivalent, using eighty (80) tons or less of welding consumables [326 IAC 2-7-1(21)(J)(vi)(II)].

Under NESHAP Subpart XXXXXX, this is considered an existing affected facility.

(d) Insignificant belt grinding operations, including one (1) Grinding Master, constructed in 2009.

(e) Insignificant surface finishing operations, including one (1) Vibe Tech Tumbler, constructed in 2008.

Note: This equipment uses a non-VOC non-HAP-containing lubricant.

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

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, 003-34222-00289, 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).
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 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
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 003-41876-00289 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or
(3) deleted.

(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:

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

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

C.8 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, 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.9 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.10 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.11 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.12 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.13 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.14 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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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.16 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.17 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.18 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) spray coating booth, identified as EU-01, constructed in 2003, with a maximum capacity of 1.25 metal containers per hour, equipped with high volume low pressure (HVLP) spray guns, using dry filters for overspray as control, and exhausting to stack 01.

(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 Hazardous Air Pollutant (HAP) [326 IAC 2-8-4][236 IAC 2-4.1]
In order to render the requirements of 326 IAC 2-4.1 not applicable and pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following:

(a) The input of individual HAP, including coating, dilution solvents and cleaning solvents, to the spray coating booth, identified as EU-01, and its associated clean-up activities shall not exceed 9.90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The input from any combination of HAPs, including coatings, dilution solvents and cleaning solvents to the spray coating booth, identified as EU-01, and its associated clean-up activities shall not exceed 24.00 tons per twelve (12) consecutive month period with compliance at the end of each month.

Compliance with these limits, combined with the potential to emit 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, and 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.

D.1.2 Volatile Organic Compounds (VOC)  [326 IAC 2-8-4][326 IAC 2-2]
In order to render the requirements of 326 IAC 2-2 (PSD) not applicable and pursuant to 326 IAC 2-8-4, the input of VOC, including coatings, dilution solvents and cleaning solvents, to the spray coating booth, identified as EU-01, shall not exceed 99.00 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period, 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.1.3 Volatile Organic Compounds (VOC)  [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the one (1) spray coating booth (EU-01) shall not exceed 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

(b) Pursuant to 326 IAC 8-2-9(f), 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:

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

2. 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.


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

5. 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 Matter [326 IAC 6-3][326 IAC 2-2]

Pursuant to 326 IAC 6-3-2(d) and in order to render 326 IAC 2-2 (PSD) not applicable, particulate from the spray coating booth, identified as EU-01, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Compliance with this requirement, combined with the potential to emit PM10 and PM2.5 of the remaining emission units, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per 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.

In addition, compliance with this requirement combined with the potential to emit PM of the remaining emission units, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

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

(a) Compliance with the HAP limitation contained in Condition D.1.1 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" HAP 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.

(b) Compliance with the VOC content limitations contained in Conditions D.1.2 and D.1.3 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.

(c) Compliance with the VOC content limitations contained in Conditions D.1.2, when noncompliant coatings for any of the subdivisions of 326 IAC 8-2-9(d) are used for any particular day for spray coating booth EU-01, shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis.

This volume weighted average for each of the subdivisions of 326 IAC 8-2-9(d) shall be determined by the following equation:

\[
A = \frac{\left( \sum C \times U \right)}{\left( \sum U \right)}
\]

Where:

- \(A\) = Volume weighted average (pounds VOC/gallon) less water as applied;
- \(C\) = VOC content of the coating (pounds VOC/gallon) less water as applied; and
- \(U\) = Usage rate of the coating (gallons/day).

D.1.7 Particulate Control

In order to ensure compliance with Condition D.1.4, the dry filters for PM, PM10, and PM2.5 control shall be in operation and control emissions from spray coating booth EU-01 at all times spray coating booth EU-01 is in operation.

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

D.1.8 Dry Filters Inspections

(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 spray coating booth vent (Stack 01) while the paint booth is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. 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 shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the vent 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 reasonable response steps. 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.

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

D.1.9 Record Keeping Requirement

(a) To document the compliance status with Conditions D.1.1 and D.1.6, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs usage limits and the HAPs emission limits established in Conditions D.1.1 and D.1.6.

(1) The individual and total HAP content of each coating material and solvent used.
(2) The amount of coating material and solvent used less water 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 usage of each individual HAP and total HAPs for each month; and

(4) The weight of each individual HAP and total HAPs emitted for each compliance period.

(b) To document the compliance status with Conditions D.1.2, D.1.3 and D.1.6, 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 usage limits and the VOC content limits established in Conditions D.1.2, D.1.3 and D.1.6.

(1) The VOC content of each coating material and solvent used.
(2) The amount of coating material and solvent used less water 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 VOC usage for each month; and
(5) The weight of VOCs emitted for each compliance period.

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

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

D.1.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted using the reporting forms located at the end of this permit, or their equivalent, no 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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
SECTION D.2  EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) One (1) abrasive blaster, constructed in 2012, with a maximum capacity of 1160 pounds per hour per nozzle, using a baghouse as control, identified as Torit Downflo, and exhausting indoors.

(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 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the Abrasive Blaster shall not exceed 2.85 pounds per hour when operating at a process weight rate of 0.58 tons per hour.

The pounds 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
- $P$ = process weight rate in tons per hour

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

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and any control devices. 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.2.3 Particulate Control

In order to comply with Condition D.2.1 and to render 326 IAC 2-7 not applicable, the baghouse, identified as Torit Downflo for PM, PM10, and PM2.5 control shall be in operation and control emissions from the abrasive blaster at all times the abrasive blaster is in operation.

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

D.2.4 Baghouse Inspections

The Permittee shall perform quarterly inspections of the baghouse, identified as Torit Downflo, controlling particulate from Abrasive Blaster to verify that it is being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. If abnormal emissions are observed, the Permittee shall take reasonable response steps. 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 shall be considered a deviation from this permit.
Record Keeping and Reporting Requirements  [326 IAC 2-8-4(3)]

D.2.5 Record Keeping Requirements

(a) To document the compliance status with Conditions D.2.4, the Permittee shall maintain records of the dates and results of the inspections required under Condition D.2.4.

(b) Sections C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.
SECTION E.1

Emissions Unit Description:

(b) Equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment \([326 \text{ IAC 2-7-1(21)(J)(vi)(EE)}]\), including the following:

1. Sixteen (16) metal inert gas welding stations, capacity: 3.5 pounds of wire per hour per welder.
2. One (1) portable stick welding station, capacity: 1.0 electrode per hour.
3. One (1) tungsten inert gas welding station, capacity: 1.0 pound of metal per hour.
4. One (1) plasma cutting station, capacity: 12 inches of metal per minute, 0.75 inches thick.
5. One (1) laser cutter, capacity: 30 inches of metal per minute, 0.75 inches thick.

Under NESHAP Subpart XXXXXX, this is considered an existing affected facility.

(c) Any of the following structural steel and bridge fabrication activities:

Cutting 200,000 linear feet or less of one (1) inch plate or equivalent, using eighty (80) tons or less of welding consumables \([326 \text{ IAC 2-7-1(21)(J)(vi)(II)}]\).

Under NESHAP Subpart XXXXXX, this is considered an existing affected facility.

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements \([326 \text{ IAC 2-8-4(1)}]\)


(a) Pursuant to 40 CFR 63.11523, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, for the above listed emissions units, as specified in 40 CFR Part 63, Subpart XXXXXX, in accordance with the schedule in 40 CFR Part 63, Subpart XXXXXX.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
E.1.2 Nine Metal Fabrication and Finishing Source Categories NESHAP [40 CFR Part 63, Subpart XXXXXX].

Pursuant to 40 CFR Part 63, Subpart XXXXXX, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart XXXXXX, (included as Attachment A to this permit), for the above listed emissions units, as specified as follows.

(1) 40 CFR 63.11514(a)(2), (b)(5), (c), and (i)
(2) 40 CFR 63.11515(a)
(3) 40 CFR 63.11516(f)
(4) 40 CFR 63.11517
(5) 40 CFR 63.11519
(6) 40 CFR 63.11521
(7) 40 CFR 63.11522
(8) 40 CFR 63.11523
(9) Table 1 to Subpart XXXXXX
(10) Table 2 to Subpart XXXXXX
INFORMATION DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: QuikCut, Inc.
Source Address: 4630 Allen Martin Drive, Fort Wayne, Indiana 46806
FESOP Permit No.: 003-34222-00289

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:
<table>
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<tr>
<th>If any of the following are not applicable, mark N/A</th>
<th>Page 2 of 2</th>
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<td>Date/Time Emergency started:</td>
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<tr>
<td>Date/Time Emergency was corrected:</td>
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<tr>
<td>Was the facility being properly operated at the time of the emergency?</td>
<td>Y N</td>
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<tr>
<td>Type of Pollutants Emitted: TSP, PM-10, SO2, VOC, NOx, CO, Pb, other:</td>
<td></td>
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<tr>
<td>Estimated amount of pollutant(s) emitted during emergency:</td>
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<tr>
<td>Describe the steps taken to mitigate the problem:</td>
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<tr>
<td>Describe the corrective actions/response steps taken:</td>
<td></td>
</tr>
<tr>
<td>Describe the measures taken to minimize emissions:</td>
<td></td>
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<tr>
<td>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:</td>
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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: QuikCut, Inc.
Source Address: 4630 Allen Martin Drive, Fort Wayne, Indiana 46806
FESOP Permit No.: 003-34222-00289
Facility: Spray coating booth (EU-01)
Parameter: Input of individual HAP
Limit: Shall not exceed 9.90 tons per twelve (12) consecutive month period.

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<td>Previous 11 Months</td>
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<td>12 Month Total</td>
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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: _____________________________________________________________
**FESOP Quarterly Report**

Source Name: QuikCut, Inc.
Source Address: 4630 Allen Martin Drive, Fort Wayne, Indiana 46806
FESOP Permit No.: F003-34222-00289
Facility: Spray coating booth (EU-01)
Parameter: Input of any combination of HAPs
Limit: Shall not exceed 24.00 tons per twelve (12) consecutive month period

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<td>This Month</td>
<td>Previous 11 Months</td>
<td>12 Month Total</td>
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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: ___________________________________________________________
FESOP Quarterly Report

Source Name: QuikCut, Inc.
Source Address: 4630 Allen Martin Drive, Fort Wayne, Indiana 46806
FESOP Permit No.: F003-34222-00289
Facility: Spray coating booth (EU-01)
Parameter: Input of VOC
Limit: Shall not exceed 99.00 tons per twelve (12) consecutive month period

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<th>QUARTER:</th>
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<thead>
<tr>
<th>Month</th>
<th>Column 1 (VOC) (tons)</th>
<th>Column 2 (VOC) (tons)</th>
<th>Column 1 + Column 2 (VOC) (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Month</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Previous 11 Months</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12 Month Total</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

☐ 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: QuikCut, Inc.
Source Address: 4630 Allen Martin Drive, Fort Wayne, Indiana 46806
FESOP Permit No.: 003-34222-00289

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 (specify permit condition #)</th>
<th>Date of Deviation:</th>
<th>Duration of Deviation:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Permit Requirement (specify permit condition #)</td>
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</tr>
<tr>
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<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Permit Requirement (specify permit condition #)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>------------------------------------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Date of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Duration of Deviation:</td>
<td></td>
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<tr>
<td>Number of Deviations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Response Steps Taken:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
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</tr>
<tr>
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</tr>
<tr>
<td>Response Steps Taken:</td>
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</table>

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</thead>
<tbody>
<tr>
<td>Date of Deviation:</td>
</tr>
<tr>
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</tr>
<tr>
<td>Number of Deviations:</td>
</tr>
<tr>
<td>Probable Cause of Deviation:</td>
</tr>
<tr>
<td>Response Steps Taken:</td>
</tr>
</tbody>
</table>

Form Completed by: _______________________________________________________
Title / Position: ___________________________________________________________
Date: ___________________________________________________________________
Phone: _________________________________________________________________
Source Description and Location

Source Name: QuikCut, Inc.  
Source Location: 4630 Allen Martin Drive, Fort Wayne, Indiana 46806  
County: Allen  
SIC Code: 3499 (Fabricated Metal Products, Not Elsewhere Classified)  
Operation Permit No.: F 003-34222-00289  
Operation Permit Issuance Date: July 31, 2014  
Significant Permit Revision No.: 003-41876-00289  
Permit Reviewer: Hachem Ismaili Alaoui

Existing Approvals

The source was issued FESOP Renewal No. 003-34222-00289 on July 31, 2014. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Allen 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 5, 2015, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2004 24-hour 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. Allen 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
Allen 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.
(e) Other Criteria Pollutants

Allen 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.

Fugitive Emissions

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.

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).

Greenhouse Gas (GHG) Emissions

On June 23, 2014, in the case of Utility Air Regulatory Group v. EPA, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4q18.pdf) 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.”

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.

Source Status - Existing Source

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.

<table>
<thead>
<tr>
<th>Source-Wide Emissions Prior to Revision (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM$^1$</td>
</tr>
<tr>
<td>--------</td>
</tr>
<tr>
<td>Total PTE of Entire Source Excluding Fugitive Emissions*</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>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>
<td>--</td>
<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.

The source opted to take limits in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable to this source and to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA). This is a previous determination made in FESOP Renewal No. 003-34222-00289 issued on July 31, 2014.

(c) These emissions are based on the TSD of FESOP Renewal No. 003-34222-00289, issued on July 31, 2014.

### Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by QuikCut, Inc. on September 3, 2019, relating to the construction of one (1) abrasive blaster unit at the source.

The following emission unit was constructed and operated without a permit:

(a) One (1) abrasive blaster, constructed in 2012, with a maximum capacity of 1160 pounds per hour per nozzle, using a baghouse as control, identified as Torit Downflo, and exhausting indoors.

### Enforcement Issues

IDEM is aware that equipment has been constructed and 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 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>PM10</th>
<th>PM2.5¹</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Single HAP²</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abrasive Blaster</td>
<td>50.81</td>
<td>35.57</td>
<td>35.57</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>50.81</td>
<td>35.57</td>
<td>35.57</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

¹PM2.5 listed is direct PM2.5.
²Single 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 the construction of new emission units with potential to emit equal to or greater than twenty-five (25) tons per year of the following pollutants:

(i) PM, PM10, or direct PM2.5.

### 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.

<table>
<thead>
<tr>
<th>Source-Wide Emissions After Issuance (ton/year)</th>
<th>PM¹</th>
<th>PM10¹</th>
<th>PM2.5¹, ²</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 Source Excluding Fugitives*</td>
<td>33.00</td>
<td>31.33</td>
<td>31.30</td>
<td>0.01</td>
<td>0.86</td>
<td>99.05</td>
<td>0.72</td>
<td>9.90 (Xylene)</td>
<td>24.15</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>100</td>
<td>10</td>
<td>25</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>250</td>
<td>--</td>
<td>--</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant."
²PM2.5 listed is direct PM2.5.
³Single highest source-wide HAP
*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 VOC, single HAP, and total HAPs limits 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 and to render the source an area source of HAP emissions under Section 112 of the Clean Air Act (CAA). 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), and 326 IAC 20 (Hazardous Air Pollutants) 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.

State Rule Applicability - Entire Source

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.

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 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, LaPorte, or Lawrenceburg Township, Dearborn County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
326 IAC 2-8-4 (FESOP) and 326 IAC 20 (Hazardous Air Pollutants)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP Revision section of this document.

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.

(2) 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 Allen 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 Allen County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

326 IAC 6.8 (Lake County: Fugitive Particulate Matter)
Pursuant to 326 IAC 6.8-10-1, this source (located in Allen County) is not subject to the requirements of 326 IAC 6.8-10 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:

**Abrasive Blaster**

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 Abrasive Blaster, 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 Abrasive Blaster shall not exceed 2.85 pounds per hour when operating at a process weight rate of 0.58 tons per hour. The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:
\[ E = 4.10 \times P^{0.67} \]

where

\[ E = \text{rate of emission in pounds per hour} \]
\[ P = \text{process weight rate in tons per hour} \]

The Torit Downflo shall be in operation at all times the Abrasive Blaster 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:

In order to assure the abrasive blaster is not subject to the requirements of 326 IAC 6-3-2, the Torit Downflo 3DF36 for PM, PM10, and PM2.5 control shall be in operation and control emissions from Abrasive Blaster at all times the abrasive blaster is in operation.

(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>Torit Downflo 3DF36 (Abrasive Blaster)</td>
<td>Torit Downflo inspections</td>
<td>Quarterly</td>
<td>Verify that it is operated and maintained per manufacturer’s specifications</td>
</tr>
</tbody>
</table>

**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) Sections A.2 and D.2 have been revised to include the Abrasive Blaster Unit to the source.

**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) spray coating booth, identified as EU-01, constructed in January 2003, with a maximum capacity of 1.25 metal containers per hour, equipped with high volume low pressure (HVLP) spray guns, utilizing dry filters for overspray control, and exhausting to Stack 01.

(b) One (1) abrasive blaster, constructed in 2012, with a maximum capacity of 1160 pounds per hour per nozzle, using a baghouse as control, identified as Torit Downflo, and exhausting indoors.

...  

**SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS**

Emissions Unit Description:

(b) One (1) abrasive blaster, constructed in 2012, with a maximum capacity of 1160 pounds per hour per nozzle, using a baghouse as control, identified as Torit Downflo, and exhausting indoors.

(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  Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the Abrasive Blaster shall not exceed 2.85 pounds per hour when operating at a process weight rate of 0.58 tons per hour. The pounds per hour limitation was calculated with the following equation:

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

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

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

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

D.2.2  Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and any control devices. 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.2.3  Particulate Control

In order to comply with Condition D.2.1, and render 326 IAC 2-7 not applicable, the baghouse, identified Torit Downflo for PM, PM10, and PM2.5 control shall be in operation and control emissions from the abrasive blaster at all times the abrasive blaster is in operation.

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

D.2.4  Baghouse Inspections

The Permittee shall perform quarterly inspections of the torit downflo 3DF36 controlling particulate from Abrasive Blaster to verify that it is being operated and maintained in accordance with the manufacturer's specifications. Inspections required by this condition shall not be performed in consecutive months. If abnormal emissions are observed, the Permittee shall take reasonable response steps. 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 shall be considered a deviation from this permit.

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

D.2.5  Record Keeping Requirements

(a) To document the compliance status with Conditions D.2.4, the Permittee shall maintain records of the dates and results of the inspections required under Condition D.2.4.

(b) Section C - General Record Keeping Requirements of this permit 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 3, 2019.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 003-41876-00289. 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 Hachem Ismaili Alaoui, 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) 232-2807 or (800) 451-6027, and ask for Hachem Ismaili Alaoui or (317) 232-2827.

(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.
## Appendix A: Emission Calculations

### Summary

**Company Name:** QuikCut, Inc.  
**Address City IN Zip:** 4630 Allen Martin Drive, Fort Wayne, IN 46806  
**FESOP Renewal:** 003-41876-00289  
**Reviewer:** Hachem Ismaili Alaoui

<table>
<thead>
<tr>
<th>Emission Unit (ID)</th>
<th>Control (Stack ID)</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spray coating booth (EU-01)</td>
<td>Dry Filters (Stack 01)</td>
<td>514.17</td>
<td>514.17</td>
<td>514.17</td>
<td>0.00</td>
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<td>0.00</td>
<td>269.27</td>
<td>226.49 Xylene</td>
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<tr>
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<td>0.07</td>
<td>0.07</td>
<td>0.01</td>
<td>0.86</td>
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<td>0.72</td>
<td>0.02</td>
<td>0.02 Hexane</td>
</tr>
<tr>
<td>Welding &amp; Cutting</td>
<td>None</td>
<td>1.96</td>
<td>1.96</td>
<td>1.96</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.13</td>
<td>0.13 Manganese</td>
</tr>
<tr>
<td>Abrasive Blaster</td>
<td>Torit Downflo (3DF36)</td>
<td>50.81</td>
<td>35.57</td>
<td>35.57</td>
<td>0.00</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Insignificant Grinding and Finishing</td>
<td>None</td>
<td>negl.</td>
<td>negl.</td>
<td>negl.</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Paved Roads</td>
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<td>0.05</td>
<td>0.01</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

**Totals:** 567.19 551.80 551.77 0.01 0.86 394.31 0.72 269.42 226.64 Xylene

**Notes**

negl. = negligible

### Controlled / Limited Potential to Emit (tons/year)

<table>
<thead>
<tr>
<th>Emission Unit (ID)</th>
<th>Control (Stack ID)</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spray coating booth (EU-01)</td>
<td>Dry Filters (Stack 01)</td>
<td>25.71</td>
<td>25.71</td>
<td>25.71</td>
<td>0.00</td>
<td>0.00</td>
<td>99.00</td>
<td>0.00</td>
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<td>9.90 Xylene</td>
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<tr>
<td>Natural Gas Combustion</td>
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<td>0.02</td>
<td>0.07</td>
<td>0.07</td>
<td>0.01</td>
<td>0.86</td>
<td>0.05</td>
<td>0.72</td>
<td>0.02</td>
<td>0.02 Hexane</td>
</tr>
<tr>
<td>Welding &amp; Cutting</td>
<td>None</td>
<td>1.96</td>
<td>1.96</td>
<td>1.96</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.13</td>
<td>0.13 Manganese</td>
</tr>
<tr>
<td>Abrasive Blaster</td>
<td>Torit Downflo (3DF36)</td>
<td>5.08</td>
<td>3.56</td>
<td>3.56</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Insignificant Grinding and Finishing</td>
<td>None</td>
<td>negl.</td>
<td>negl.</td>
<td>negl.</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Paved Roads</td>
<td>None</td>
<td>0.24</td>
<td>0.05</td>
<td>0.01</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

**Totals:** 33.00 31.33 31.30 0.01 0.86 99.05 0.72 24.15 9.90 Xylene

**Notes**

negl. = negligible

* The source claims the dry filters achieve a control efficiency of 98%. However, for the purposes of determining compliance with 326 IAC 2-8-4 (FESOP), the controlled PTE is calculated assuming 95% control, as the dry filters are required to operate.
### Uncontrolled Potential to Emit (tons/yr)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO₂</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abrasive Blasting</td>
<td>50.81</td>
<td>35.57</td>
<td>35.57</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

### Controlled Potential to Emit (tons/yr)

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
<th>SO₂</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
<th>Total HAPs</th>
<th>Worst Single HAP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abrasive Blasting</td>
<td>5.08</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>
### Methodology

- **Exempt compounds** include all compounds specifically exempted from the definition of volatile organic compounds (VOC) under 40 CFR 51.100(s).
- **Weight % VOC** = \[Weight % Volatile (water, VOC, and exempt Compounds*)\] - \[Weight % water and exempt compounds\]
- **Max Material Usage** (gal/unit) = \[Maximum Material Usage (gal/unit)\] * [Maximum Capacity (units/hour)] * [1 - Weight % Volatile] * [1 - Transfer Efficiency]

### Material Table

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lbs/gal)</th>
<th>Weight % VOC</th>
<th>Volume % Solids</th>
<th>Maximum Material Usage (gal/unit)</th>
<th>Maximum Capacity (units/hour)</th>
<th>Pounds VOC per gallon coating less water and exempt compounds</th>
<th>Pounds VOC per gallon coating</th>
<th>PTE of VOC (lbs/hour)</th>
<th>PTE of VOC (tons/year)</th>
<th>Uncontrolled PTE of PM/PM10/PM2.5 (tons/year)</th>
<th>Pounds VOC per gallon coating solids</th>
<th>Transfer Efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Polyurea HT</td>
<td>8.54</td>
<td>0.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>6.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>212.00</td>
<td>0.00</td>
<td>75%</td>
</tr>
<tr>
<td>Part B</td>
<td>8.51</td>
<td>0.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>6.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>242.00</td>
<td>0.00</td>
<td>75%</td>
</tr>
<tr>
<td>R-T-S</td>
<td>9.03</td>
<td>0.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>5.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>514.00</td>
<td>0.00</td>
<td>75%</td>
</tr>
<tr>
<td>Acrylon 216</td>
<td>11.58</td>
<td>25.00%</td>
<td>0.00%</td>
<td>98.70%</td>
<td>1.60</td>
<td>0.00</td>
<td>2.90</td>
<td>27.79</td>
<td>667.00</td>
<td>121.73</td>
<td>91.30</td>
<td>3.98%</td>
</tr>
<tr>
<td>Part B</td>
<td>9.33</td>
<td>0.00%</td>
<td>0.00%</td>
<td>100.00%</td>
<td>5.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>24.52</td>
<td>N/A</td>
<td>75%</td>
</tr>
<tr>
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<td>0.00%</td>
<td>98.20%</td>
<td>1.20</td>
<td>0.00</td>
<td>2.32</td>
<td>27.79</td>
<td>667.05</td>
<td>121.74</td>
<td>115.81</td>
<td>3.98%</td>
</tr>
<tr>
<td>Phenoline 1205</td>
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<td>23.00%</td>
<td>0.00%</td>
<td>73.00%</td>
<td>4.00</td>
<td>1.00</td>
<td>2.58</td>
<td>12.36</td>
<td>296.76</td>
<td>54.16</td>
<td>45.33</td>
<td>4.09%</td>
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<td>0.00%</td>
<td>100.00%</td>
<td>4.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>11.38</td>
<td>0.00</td>
<td>75%</td>
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<tr>
<td>R-T-S</td>
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<td>19.12%</td>
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<td>70.40%</td>
<td>6.00</td>
<td>1.00</td>
<td>2.06</td>
<td>12.37</td>
<td>296.80</td>
<td>54.17</td>
<td>57.28</td>
<td>2.93%</td>
</tr>
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<td>Carbothane 133HB</td>
<td>12.10</td>
<td>28.00%</td>
<td>0.00%</td>
<td>55.00%</td>
<td>5.14</td>
<td>1.00</td>
<td>3.39</td>
<td>17.41</td>
<td>417.94</td>
<td>76.27</td>
<td>49.03</td>
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<tr>
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<td>8.80</td>
<td>25.00%</td>
<td>0.00%</td>
<td>71.00%</td>
<td>0.86</td>
<td>1.00</td>
<td>2.20</td>
<td>1.89</td>
<td>45.41</td>
<td>8.29</td>
<td>6.22</td>
<td>3.10%</td>
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<tr>
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<td>57.30%</td>
<td>6.00</td>
<td>1.00</td>
<td>2.22</td>
<td>18.32</td>
<td>463.56</td>
<td>84.60</td>
<td>55.26</td>
<td>5.82%</td>
</tr>
<tr>
<td>Epoxy Primer</td>
<td>13.95</td>
<td>20.00%</td>
<td>0.00%</td>
<td>63.00%</td>
<td>6.00</td>
<td>1.00</td>
<td>2.79</td>
<td>16.74</td>
<td>401.76</td>
<td>73.32</td>
<td>73.32</td>
<td>4.43%</td>
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<td>1.00</td>
<td>2.28</td>
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<td>328.41</td>
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<td>12.00</td>
<td>1.00</td>
<td>2.54</td>
<td>30.48</td>
<td>730.24</td>
<td>133.27</td>
<td>141.58</td>
<td>3.87%</td>
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<tr>
<td>Macropoxy 646</td>
<td>12.55</td>
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<td>71.00%</td>
<td>4.00</td>
<td>1.00</td>
<td>2.08</td>
<td>8.33</td>
<td>200.00</td>
<td>36.50</td>
<td>45.84</td>
<td>2.93%</td>
</tr>
<tr>
<td>Part A (Color)</td>
<td>13.53</td>
<td>12.30%</td>
<td>0.00%</td>
<td>76.00%</td>
<td>4.00</td>
<td>1.00</td>
<td>1.66</td>
<td>16.66</td>
<td>159.76</td>
<td>29.16</td>
<td>51.97</td>
<td>2.19%</td>
</tr>
<tr>
<td>R-T-S</td>
<td>13.04</td>
<td>14.37%</td>
<td>0.00%</td>
<td>73.50%</td>
<td>8.00</td>
<td>1.00</td>
<td>1.87</td>
<td>14.99</td>
<td>359.78</td>
<td>65.66</td>
<td>97.82</td>
<td>2.55%</td>
</tr>
<tr>
<td>20 Quick Dry Enamel</td>
<td>7.98</td>
<td>47.00%</td>
<td>0.00%</td>
<td>55.00%</td>
<td>6.00</td>
<td>4.00</td>
<td>3.75</td>
<td>3.75</td>
<td>90.01</td>
<td>2160.35</td>
<td>111.15</td>
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<tr>
<td>Steel Spec B500RQ</td>
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<td>62.00%</td>
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<td>2.78</td>
<td>27.78</td>
<td>234.54</td>
<td>97.57</td>
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<td>4.49%</td>
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<td><strong>Totals</strong></td>
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<td>90.01</td>
<td>2160.35</td>
<td>394.26</td>
<td>514.17</td>
</tr>
</tbody>
</table>

**Control Efficiency** = \[\frac{Total Controlled Potential to Emit (PTE) (tons/year)}{100}\] = 95%

Controlled PTE of PM/PM10/PM2.5 (tons/year) = \[\text{Uncontrolled PTE of PM/PM10/PM2.5 (tons/year)} \times \text{Control Efficiency}\]

**Uncontrolled PTE of PM/PM10/PM2.5 (tons/year)** = \(\text{Density (lbs/gal)} \times \text{Maximum Material Usage (gal/unit)} \times \text{Maximum Capacity (units/hour)} \times \text{1 - Weight % Volatile)} \times \text{1 - Transfer Efficiency}\)

**Pounds VOC per gallon coating less water and exempt compounds** = \(\text{Density (lbs/gal)} \times \text{Weight % water and exempt compounds}\)

**Control Efficiency** = \(\frac{\text{Total Controlled Potential to Emit (PTE) (tons/year)}}{\text{100}\%}\) = 95.0%

**Total Controlled Potential to Emit (PTE) (tons/year)** = 25.71
### Polyurea HT

<table>
<thead>
<tr>
<th>Material</th>
<th>Density (lbs/gal)</th>
<th>In Material Usage (unit/hour)</th>
<th>Weight % MEK</th>
<th>Weight % Xylene</th>
<th>Weight % HDI</th>
<th>Weight % Ethylbenzene</th>
<th>Weight % Toluen</th>
<th>Weight % Glycol Ethers</th>
<th>Weight % MIBK</th>
<th>PTE of Xylene (tons/year)</th>
<th>PTE of MEK (tons/year)</th>
<th>PTE of HDI (tons/year)</th>
<th>PTE of Ethylbenzene (tons/year)</th>
<th>PTE of Toluen (tons/year)</th>
<th>PTE of Glycol Ethers (tons/year)</th>
<th>PTE of MIBK (tons/year)</th>
<th>PTE of Total HAPs (tons/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Part A</td>
<td>6.54</td>
<td>26.000</td>
<td>1.000</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</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>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
</tr>
<tr>
<td>Part B</td>
<td>5.31</td>
<td>26.000</td>
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<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
<td>0.00%</td>
</tr>
</tbody>
</table>

**Appendix A: Emissions Calculations**

**Hazardous Air Pollutants (HAPs)**

**From Surface Coating Operations**

**Company Name:** QuikCut, Inc.  
**Source Address:** 4630 Allen Martin Drive, Fort Wayne, IN 46806  
**Permit Number:** 003-41876-00289  
**Reviewer:** Hachem Ismaili Alaoui

**Hazardous Air Pollutant (HAP) is defined by Section 112(b) of the Clean Air Act.**

**Methodology**

\[
PTE \text{ of HAP (tons/year)} = \left[ \text{Density (lbs/gal)} \times \left( \text{Maximum Material Usage (gal/unit)} \times \left( \text{Maximum Capacity (unit/hour)} \times \left( \text{Weight % HAP} \times [8760 \text{ hours/year}] \times [1 \text{ ton/2000 lbs}] \right) \right) \right] \text{SUM (PTE of Each Single HAP (tons/year))} \]

Hazardous air pollutant (HAP) is defined by Section 112(b) of the Clean Air Act.
Appendix A: Emission Calculations
Abrasive Blasting - Confined

Company Name: QuickCut, Inc.
Source Address: 4630 Allen Martin Drive, Fort Wayne, Indiana 46806
Permit Number: 003-41876-00239
Reviewer: Hachem Ismaili Alaoui

Table 1 - Emission Factors for Abrasives

<table>
<thead>
<tr>
<th>Abrasive</th>
<th>pm (lb PM / lb abrasive)</th>
<th>PM10 (lb PM10 / lb PM)</th>
</tr>
</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>
</tr>
<tr>
<td>Steel Shot</td>
<td>0.004</td>
<td>0.86</td>
</tr>
<tr>
<td>Other</td>
<td>0.010</td>
<td></td>
</tr>
</tbody>
</table>

Potential to Emit Before Control

FR = Flow rate of actual abrasive (lb/hr) = 1160.00 lb/hr (per nozzle)
w = fraction of time of wet blasting = 0 %
N = number of nozzles = 1
EF = PM emission factor for actual abrasive from Table 1 = 0.010 lb PM / lb abrasive
PM10 emission factor ratio for actual abrasive from Table 1 = 0.70 lb PM10 / lb PM

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

<table>
<thead>
<tr>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>lb/hr</td>
<td>lb/hr</td>
<td></td>
</tr>
<tr>
<td>lb/day</td>
<td>lb/day</td>
<td></td>
</tr>
<tr>
<td>ton/yr</td>
<td>ton/yr</td>
<td></td>
</tr>
</tbody>
</table>

Potential to Emit After Control

Emission Control Device Efficiency = 90.0%

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

<table>
<thead>
<tr>
<th>PM</th>
<th>PM10</th>
<th>PM2.5</th>
</tr>
</thead>
<tbody>
<tr>
<td>lb/hr</td>
<td>lb/hr</td>
<td></td>
</tr>
<tr>
<td>lb/day</td>
<td>lb/day</td>
<td></td>
</tr>
<tr>
<td>ton/yr</td>
<td>ton/yr</td>
<td></td>
</tr>
</tbody>
</table>

METHODOLOGY

PM2.5 emissions assumed equal to PM10 emissions.

Potential to Emit (before control) = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))
Potential to Emit (after control) = [Potential to Emit (before control)] / [1 - control efficiency]
Potential to Emit (tons/year) = [Potential to Emiss (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]
**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>QuikCut, Inc.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Address:</td>
<td>4630 Allen Martin Drive, Fort Wayne, IN 46806</td>
</tr>
<tr>
<td>Permit Number:</td>
<td>003-41876-00289</td>
</tr>
<tr>
<td>Reviewer:</td>
<td>Hachem Ismaili Alouai</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HHV Heat Input Capacity</th>
<th>mmBtu/hr</th>
<th>Potential Throughput</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.0</td>
<td></td>
<td>1,020</td>
</tr>
<tr>
<td></td>
<td></td>
<td>17.2</td>
</tr>
</tbody>
</table>

### Pollutant Emission Factors

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor in lb/MMCF</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM*</td>
<td>1.9</td>
<td>0.02</td>
</tr>
<tr>
<td>PM10*</td>
<td>7.6</td>
<td>0.07</td>
</tr>
<tr>
<td>Direct PM2.5</td>
<td>7.6</td>
<td>0.07</td>
</tr>
<tr>
<td>SO2</td>
<td>0.6</td>
<td>0.01</td>
</tr>
<tr>
<td>NOx</td>
<td>100</td>
<td>0.86</td>
</tr>
<tr>
<td>VOC</td>
<td>5.5</td>
<td>0.05</td>
</tr>
<tr>
<td>CO</td>
<td>84</td>
<td>0.72</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
PM2.5 emission factor is filterable and condensable PM2.5 combined.

**Emission Factors for NOx:**
- Uncontrolled = 100
- Low NOx Burner = 50
- Low NOx Burners/Flue gas recirculation = 32

### Methodology

All emission factors are based on normal firing.

**MMBtu = 1,000,000 Btu**

**MMCF = 1,000,000 Cubic Feet of Gas**

Emission Factors are from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

### Hazardous Air Pollutants (HAPs)

#### HAPs - Organics

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Benzene</th>
<th>Dichlorobenzene</th>
<th>Formaldehyde</th>
<th>Hexane</th>
<th>Toluene</th>
<th>Total - Organics</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1E-03</td>
<td>2.1E-03</td>
<td>1.2E-03</td>
<td>7.5E-02</td>
<td>1.8E+00</td>
<td>3.4E-03</td>
<td>0.02</td>
</tr>
</tbody>
</table>

| Potential Emission in tons/yr | 1.8E-05 | 1.0E-05 | 6.4E-04 | 0.02 | 2.9E-05 | 0.02 |

#### HAPs - Metals

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
<th>Total - Metals</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Potential Emission in tons/yr | 4.3E-06 | 9.4E-06 | 1.2E-05 | 3.3E-06 | 1.8E-05 | 4.7E-05 |

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.
Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: QuikCut, Inc.
Source Address: 4630 Allen Martin Drive, Fort Wayne, IN 46806
Permit Number: 003-41976-00289
Reviewer: Hachem Ismaili Alaoui

<table>
<thead>
<tr>
<th>Process</th>
<th>Number of Stations</th>
<th>Maximum Metal Cutting Rate (inches/minute)</th>
<th>Maximum Metal Thickness (inches)</th>
<th>Emission Factors (lb pollutant/lb electrode)</th>
<th>Potential to Emit (lbs/hr)</th>
<th>HAPs (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Welding</td>
<td></td>
<td></td>
<td></td>
<td>PM/PM10/PM2.5</td>
<td>Mn</td>
<td>Ni</td>
</tr>
<tr>
<td>Metal Inert Gas (MIG) (carbon steel)</td>
<td>16</td>
<td>3.5</td>
<td>36</td>
<td>1800</td>
<td>0.0815</td>
<td>0.0002</td>
</tr>
<tr>
<td>Stick (E7018 electrode)</td>
<td>1</td>
<td>1</td>
<td>24</td>
<td>1</td>
<td>0.0055</td>
<td>0.0005</td>
</tr>
<tr>
<td>Tungsten Inert Gas (TIG) (carbon steel)</td>
<td>1</td>
<td>1</td>
<td>24</td>
<td>1</td>
<td>0.0055</td>
<td>0.0005</td>
</tr>
</tbody>
</table>

Plasma**

<table>
<thead>
<tr>
<th>Number of Stations</th>
<th>Maximum Metal Thickness (inches)</th>
<th>Maximum Metal Cutting Rate (inches/minute)</th>
<th>Emission Factors (lb pollutant/1,000 inches cut, 1 inch thick)**</th>
<th>Potential to Emit (lbs/hr)</th>
<th>HAPs (lbs/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oxyacetylene</td>
<td>1</td>
<td>0.75</td>
<td>36</td>
<td>1800</td>
<td>0.0815</td>
</tr>
<tr>
<td><strong>Plasma</strong></td>
<td>1</td>
<td>0.75</td>
<td>12</td>
<td>72</td>
<td>0.0039</td>
</tr>
</tbody>
</table>

Totals

Potential to Emit (lbs/hr) = 0.46
Potential to Emit (lbs/day) = 10.72
Potential to Emit (tons/year) = 1.96

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 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 inches of cut, 8 mm thick

Plasma cutting: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum Metal Cutting Rate, inches/minute) x (Emission Factor, lb pollutant/1,000 inches cut, 8 mm thick)

Cutting: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum Metal Cutting Rate, inches/minute) x (60 minutes/hour) x (Emission Factor, lb pollutant/1,000 inches cut, 1 inch thick)

Welding: Potential to Emit (lbs/hr) = (Number of stations) x (Maximum electrode consumption per station, lbs/hr) x (Emission Factor, lb pollutant/lb of electrode used)

Potential to Emit (lbs/hr) = Potential to Emit (lbs/hr) x (24 hours/day)

Potential to Emit (tons/year) = Potential to Emit (lbs/hr) x (8,760 hours/year) x (1 ton/2,000 lbs)
Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: QuikCut Inc
Source Address: 4630 Allen Martin Drive Fort Wayne, Indiana 46806
Permit Number: 003-41676-00289
Reviewer: Hachem Ismaili Alaoui

Paved Roads at Industrial Site
The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

<table>
<thead>
<tr>
<th>Type</th>
<th>Maximum number of vehicles per day</th>
<th>Number of one-way trips per day per vehicle</th>
<th>Maximum trips per day (trip/day)</th>
<th>Maximum Weight of Loaded Vehicle (tons/trip)</th>
<th>Total Weight driven per day (tons/day)</th>
<th>Maximum one-way distance (ft/mile)</th>
<th>Maximum one-way distance (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle (entering plant) (one-way trip)</td>
<td>1.0</td>
<td>1.0</td>
<td>1.0</td>
<td>40.0</td>
<td>40.0</td>
<td>9,780</td>
<td>0.189</td>
<td>69.1</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>1.0</td>
<td>1.0</td>
<td>1.0</td>
<td>40.0</td>
<td>40.0</td>
<td>9,780</td>
<td>0.189</td>
<td>69.1</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>2.0</strong></td>
<td><strong>80.0</strong></td>
<td><strong>1.0</strong></td>
<td><strong>80.0</strong></td>
<td><strong>80.0</strong></td>
<td><strong>19,560</strong></td>
<td><strong>0.378</strong></td>
<td><strong>138.3</strong></td>
</tr>
</tbody>
</table>

Average Vehicle Weight Per Trip = \( \frac{\text{Average Miles Per Trip} \times \text{Maximum one-way distance (mi/trip)}}{5280} \) tons/trip

Unmitigated Emission Factor, \( E_u = [k \times (sL)^{0.91} \times W^{1.02}] \) (Equation 1 from AP-42 13.2.1)

\[
E_u = \left[ \frac{k \times (sL)^{0.91} \times W^{1.02}}{[\text{VMT}]^{1.02}} \right]
\]

where:
- \( k = 0.011 \) for PM, 0.0022 for PM10, 0.00054 for PM2.5 (AP-42 Table 13.2.1-1)
- \( W = 40.0 \) tons/trip
- \( sL = 9.7 \) g/m^2 (silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, \( E_{ext} = E_u \times \left[ 1 - \frac{p}{4N} \right] \) (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, \( E_{ext} = E_u \times \left[ 1 - \frac{p}{4N} \right] \)

\[
\begin{align*}
PM & = 3.745 \text{ lb/mile} \\
PM_{10} & = 0.749 \text{ lb/mile} \\
PM_{2.5} & = 0.1838 \text{ lb/mile}
\end{align*}
\]

\[
\begin{align*}
E_{ext} & = 3.424 \text{ lb/mile} \\
E_{ext} & = 0.685 \text{ lb/mile} \\
E_{ext} & = 0.1681 \text{ lb/mile}
\end{align*}
\]

Process

<table>
<thead>
<tr>
<th>PTE of PM (Before Control) tons/yr</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>Vehicle (entering plant) (one-way trip)</td>
<td>0.12</td>
<td>0.02</td>
<td>0.01</td>
</tr>
<tr>
<td>Vehicle (leaving plant) (one-way trip)</td>
<td>0.12</td>
<td>0.02</td>
<td>0.01</td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>0.24</strong></td>
<td><strong>0.05</strong></td>
<td><strong>0.01</strong></td>
</tr>
</tbody>
</table>

**Methodology**

<table>
<thead>
<tr>
<th>Total Weight driven per day (ton/day)</th>
<th>Maximum Weight of Loaded Vehicle (tons/trip)</th>
<th>Maximum one-way distance (miles/day)</th>
<th>Maximum one-way miles (miles/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>( = \text{Maximum trips per day (trip/day)} \times \text{Maximum one-way distance (mi/trip)} )</td>
<td>( = \text{Maximum vehicle weight (tons/trip)} )</td>
<td>( = \text{Average Vehicle Weight Per Trip (ton/trip)} )</td>
<td>( = \text{Total Weight driven per day (ton/day)} )</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Average Vehicle Weight Per Trip (ton/day)</th>
<th>Maximum one-way miles (miles/day)</th>
<th>Mitigated Emission Factor (lb/mile)</th>
<th>Mitigated PTE (Before Control) (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>( = \text{Average Vehicle Weight Per Trip (ton/trip)} \times \text{Average Vehicle Weight Per Trip (ton/trip)} )</td>
<td>( = \text{Mitigated PTE (Before Control) (ton/yr)} )</td>
<td>( = \frac{\text{Mitigated PTE (Before Control) (ton/yr)} \times \text{Mitigated Emission Factor (lb/mile)}}{\text{(ton/2000 lbs)}} )</td>
<td>( = \frac{\text{Mitigated PTE (Before Control) (ton/yr)} \times \text{Mitigated Emission Factor (lb/mile)}}{\text{(ton/2000 lbs)}} )</td>
</tr>
</tbody>
</table>

**Abbreviations**

- PM = Particulate Matter
- PM10 = Particulate Matter (<10 um)
- PM2.5 = Particulate Matter (<2.5 um)
- PTE = Potential to Emit
December 3, 2019

Mr. Brian Swing  
QuikCut, Inc.  
4630 Allen Martin Drive  
Fort Wayne, Indiana 46806

Re: Public Notice  
QuikCut, Inc.  
Permit Level: FESOP SPR (Minor PSD)  
Permit Number: 003-41876-00289

Dear Mr. Swing:

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 Allen County Public Library (Main Branch), 900 Library Plaza in Fort Wayne, Indiana. 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 Hachem Ismaili Alaoui, 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 2-2827 or dial (317) 232-2827.

Sincerely,

John F. Jackson

John F. Jackson  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover Letter 4/12/19
December 3, 2019

To: Allen County Public Library (Main Branch)

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: QuikCut, Inc.
Permit Number: 003-41876-00289

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 Smiddle-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

December 3, 2019
QuikCut, Inc.
003-41876-00289

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

December 3, 2019

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

Permit Number: 003-41876-00289
Applicant Name: QuikCut, Inc.
Location: Fort Wayne, Allen 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

#### IDEM Staff
JJACKSON 12/3/2019
Quikcut Inc 003-41876-00289 (DRAFT)

<table>
<thead>
<tr>
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<th>Type of Mail:</th>
<th>CERTIFICATE OF MAILING ONLY</th>
</tr>
</thead>
</table>

<table>
<thead>
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<th>Line</th>
<th>Article Number</th>
<th>Name, Address, Street and Post Office Address</th>
<th>Postage</th>
<th>Handing Charges</th>
<th>Act. Value (If Registered)</th>
<th>Insured Value</th>
<th>Due Send if COD</th>
<th>R.R. Fee</th>
<th>S.D. Fee</th>
<th>S.H. Fee</th>
<th>Rest. Del. Fee</th>
<th>Remarks</th>
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<td>Brian Swing Quikcut Inc 4630 Allen Martin Dr Fort Wayne IN 46806 (Source CAATS)</td>
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<td>Daniel &amp; Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)</td>
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<td>Duane &amp; Deborah Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)</td>
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<td></td>
<td>Allen County Public Library (Main Branch) 900 Library Plaza, P.O. Box 2270 Fort Wayne IN 46802 (Library)</td>
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<td></td>
<td>Fort Wayne City Council and Mayors Office 200 E Berry Street Ste 120 Fort Wayne IN 46802 (Local Official)</td>
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<td>Mr. Jeff Coburn Plumbers &amp; Steamfitters, Local 166 2930 W Ludwg Rd Fort Wayne IN 46818-1328 (Affected Party)</td>
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<td>Roanoke Town Council P.O. Box 328 Roanoke IN 46763 (Local Official)</td>
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<td>Allen Co. Board of Commissioners 200 E Berry Street Ste 410 Fort Wayne IN 46802 (Local Official)</td>
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<td>Fort Wayne-Allen County Health Department 200 E Berry St Suite 360 Fort Wayne IN 46802 (Health Department)</td>
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<td>Lisa Green The Journal Gazette 600 W Main St Fort Wayne IN 46802 (Affected Party)</td>
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| Total number of pieces Listed by Sender | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50,000 per occurrence. The maximum indemnity payable on Express mill merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See *Domestic Mail Manual* R900, S913, and S921 for limitations of coverage on insured and COD mail. See *International Mail Manual* for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |

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