



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Minor Source Operating Permit (MSOP)

for Schneider Electric in Huntington County

MSOP Renewal No.: M069-43232-00088

The Indiana Department of Environmental Management (IDEM) has received an application from Schneider Electric located at 6 Commercial Road, Huntington, IN 46750 for a renewal of its MSOP issued on March 31, 2016. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Schneider Electric to continue to operate its existing source.

This draft permit does not contain any new equipment that would emit air pollutants; however, 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). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

A copy of the permit application and IDEM's preliminary findings have been sent to:

Huntington City Township Public Library
255 West Park Drive
Huntington, IN 46750

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

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

How can you participate in this process?

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

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number M06-43232-00088 in all correspondence.

Comments should be sent to:

Travis Flock
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for Travis Flock or (317) 233-1782
Or dial directly: (317) 233-1782
Fax: (317) 232-6749 attn: Travis Flock
E-mail: tflock@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 and will also be sent to 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 Travis Flock or my staff at the above address.



Brian Williams, Section Chief
Permits Branch
Office of Air Quality



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Eric J. Holcomb
Governor

DRAFT

Bruno L. Pigott
Commissioner

**Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY**

**Schneider Electric
6 Commercial Road
Huntington, Indiana 46750**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: M069-43232-00088	
Master Agency Interest ID: 29586	
Issued by:	Issuance Date:
Brian Williams, Section Chief Permits Branch Office of Air Quality	Expiration Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary Power, Distribution, and Specialty Transformer Manufacturing.

Source Address:	6 Commercial Road, Huntington, Indiana 46750
General Source Phone Number:	260-355-2846
SIC Code:	3612 (Power, Distribution, and Specialty Transformer Manufacturing)
County Location:	Huntington (Huntington Township)
Source Location Status:	Nonattainment for SO ₂ standard Attainment for all other criteria pollutants
Source Status:	Minor Source 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

A.2 Emission Units and Pollution Control Equipment Summary

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

(a) HVAC units, as follows:

- (1) Two (2) natural gas-fired HVAC units, identified as Units 1 and 2, constructed in 2000, permitted in 2015, with a maximum heat input capacity of 0.21 MMBtu/hr, each, exhausting outdoors.
- (2) One (1) natural gas-fired HVAC unit, identified as Unit 3, permitted in 2019, with a maximum heat input capacity of 0.36 MMBtu/hr, exhausting outdoors.
- (3) One (1) natural gas-fired HVAC unit, identified as Unit 4, constructed in 1998, permitted in 2015, with a maximum heat input capacity of 0.21 MMBtu/hr, exhausting outdoors.
- (4) One (1) natural gas-fired HVAC unit, identified as Unit 5, constructed in 2018, permitted in 2019, with a maximum heat input capacity of 0.21 MMBtu/hr, exhausting outdoors.
- (5) Three (3) natural gas-fired HVAC units, identified as Units 6, 7, and 8, constructed in 1996, permitted in 2015, with a maximum heat input capacity of 0.50 MMBtu/hr, each, exhausting outdoors.
- (6) One (1) natural gas-fired HVAC unit, identified as Unit 9, constructed in 2013, permitted in 2015, with a maximum heat input capacity of 0.30 MMBtu/hr, exhausting outdoors.

- (7) One (1) natural gas-fired HVAC unit, identified as Unit 10, permitted in 2017, with a maximum heat input capacity of 0.10 MMBtu/hr, exhausting outdoors.
- (b) Process ovens, as follows:
 - (1) One (1) natural gas-fired oven, identified as Control/Resin Oven #1, permitted in 2015, modification permitted in 2019, with a maximum capacity of 0.39 MMBtu/hr, and exhausting outdoors.
 - (2) One (1) natural gas-fired oven, identified as Vent 1 Oven #1, permitted in 2015, modification permitted in 2019, with a maximum capacity of 0.75 MMBtu/hr, and exhausting outdoors.
 - (3) One (1) natural gas-fired oven, identified as Vent 2 Oven #1, permitted in 2015, with a maximum capacity of 0.75 MMBtu/hr, and exhausting outdoors.
 - (4) One (1) natural gas-fired oven, identified as Vent 2 Oven #2, permitted in 2015, modification permitted in 2019, with a maximum capacity of 0.65 MMBtu/hr, and exhausting outdoors.
 - (5) One (1) natural gas-fired oven, identified as Control/Resin Oven #3, permitted in 2019, with a maximum capacity of 0.50 MMBtu/hr, and exhausting outdoors.
 - (6) One (1) natural gas-fired oven, identified as Control/Resin Oven #4, permitted in 2019, with a maximum capacity of 0.50 MMBtu/hr, and exhausting outdoors.
- (c) One (1) sand handling operation, identified as SAND, with a maximum capacity of 45.48 pounds per hour, constructed prior to 1970, using no control, and exhausting indoors.
- (d) One (1) Control and Resin Line, identified as CRL, constructed prior to 1970, consisting of the following:
 - (1) One (1) resin filling line, with a maximum throughput of six transformers per hour, using no control and exhausting indoors.
 - (2) One (1) resin dip line, with a maximum capacity of 22 units per hour, using no control, and exhausting indoors.
- (e) One (1) Ventilation Line, identified as VENT, consisting of the following:
 - (1) Vent 1 varnish dip coating operation, constructed prior to 1970, with a maximum capacity of four (4) units per hour, using no control, and exhausting indoors.
 - (2) Vent 2 resin dip coating operation, constructed prior to 1970, with a maximum capacity of four (4) units per hour, using no control, and exhausting indoors.
- (f) One (1) Welding area, identified as WELD, with a maximum capacity of 497 pounds of wire per day, constructed prior to 1970, using no control, and exhausting indoors.
- (g) Cleaners and solvents having a vapor pressure equal to or less than two kilo Pascals (2.0 kPa) measured at 38 degrees C, where the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months.
- (h) Paved roads and parking lots with public access.

- (i) Sources that consist of only the following:
 - (1) The following equipment related to manufacturing activities not resulting in the emission of HAPs, constructed prior to 1970, permitted in 2015:
 - (A) Brazing equipment.
 - (B) Soldering equipment.
- (j) Use of surface coatings using brush and roll application methods, identified as CHEM, constructed prior to 1970, permitted in 2015.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M069-43232-00088, 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

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

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

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

B.7 Duty to Provide Information

- (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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 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
- (c) The notification 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.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (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 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.
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M069-43232-00088 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.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

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 one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete 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 one hundred twenty (120) days 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 2-6.1 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 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry
[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][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 permitted 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.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ,.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(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 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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.

- (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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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

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

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

no later than thirty-five (35) days prior to the intended test date.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11]

- (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

C.12 Response to Excursions or Exceedances

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.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (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.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, startups or shutdowns of any emission unit or emission control equipment, that results in violations of applicable air pollution control regulations or applicable emission limitations must be kept and retained for a period of three (3) years and be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any emission unit or emission control equipment occurs that lasts more than one (1) hour, the condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification must be made by telephone or other electronic means, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of the occurrence.
- (c) Failure to report a malfunction of any emission unit or emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information on the scope and expected duration of the malfunction must be provided, including the items specified in 326 IAC 1-6-2(c)(3)(A) through (E).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (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. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of 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

- (b) 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.

- (c) 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) HVAC units, as follows:
- (1) Two (2) natural gas-fired HVAC units, identified as Units 1 and 2, constructed in 2000, permitted in 2015, with a maximum heat input capacity of 0.21 MMBtu/hr, each, exhausting outdoors.
 - (2) One (1) natural gas-fired HVAC unit, identified as Unit 3, permitted in 2019, with a maximum heat input capacity of 0.36 MMBtu/hr, exhausting outdoors.
 - (3) One (1) natural gas-fired HVAC unit, identified as Unit 4, constructed in 1998, permitted in 2015, with a maximum heat input capacity of 0.21 MMBtu/hr, exhausting outdoors.
 - (4) One (1) natural gas-fired HVAC unit, identified as Unit 5, constructed in 2018, permitted in 2019, with a maximum heat input capacity of 0.21 MMBtu/hr, exhausting outdoors.
 - (5) Three (3) natural gas-fired HVAC units, identified as Units 6, 7, and 8, constructed in 1996, permitted in 2015, with a maximum heat input capacity of 0.50 MMBtu/hr, each, exhausting outdoors.
 - (6) One (1) natural gas-fired HVAC unit, identified as Unit 9, constructed in 2013, permitted in 2015, with a maximum heat input capacity of 0.30 MMBtu/hr, exhausting outdoors.
 - (7) One (1) natural gas-fired HVAC unit, identified as Unit 10, permitted in 2017, with a maximum heat input capacity of 0.10 MMBtu/hr, exhausting outdoors.

(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 2-6.1-5(a)(1)]

D.1.1 Particulate Emissions [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the following units shall be limited to Pt pounds per MMBtu heat input, as follows:

Emission Unit	Unit ID	Pt (lb/MMBtu)
HVAC	1	0.6
HVAC	2	0.6
HVAC	3	0.6
HVAC	4	0.6
HVAC	5	0.6
HVAC	6	0.6
HVAC	7	0.6
HVAC	8	0.6
HVAC	9	0.6
HVAC	10	0.6

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Schneider Electric
Source Address:	6 Commercial Road
City:	Huntington, Indiana 46750
Phone #:	260-355-2846
MSOP #:	M069-43232-00088

I hereby certify that Schneider Electric is:

still in operation.

no longer in operation.

I hereby certify that Schneider Electric is:

in compliance with the requirements of MSOP M069-43232-00088.

not in compliance with the requirements of MSOP M069-43232-00088.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865**

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? _____, 25 TONS/YEAR SULFUR DIOXIDE ? _____, 25 TONS/YEAR NITROGEN OXIDES? _____, 25 TONS/YEAR VOC ? _____, 25 TONS/YEAR HYDROGEN SULFIDE ? _____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? _____, 25 TONS/YEAR FLUORIDES ? _____, 100 TONS/YEAR CARBON MONOXIDE ? _____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? _____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? _____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? _____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? _____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

**Technical Support Document (TSD) for a
Minor Source Operating Permit (MSOP) Renewal**

Source Description and Location

Source Name:	Schneider Electric
Source Location:	6 Commercial Road, Huntington, IN 46750
County:	Huntington (Huntington)
SIC Code:	3612 (Power, Distribution, and Specialty Transformer Manufacturing)
Permit Renewal No.:	M69-43232-00088
Permit Reviewer:	Travis Flock

On September 1, 2020, Schneider Electric submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Schneider Electric relating to the operation of a stationary power, distribution, and specialty transformer manufacturing operation. Schneider Electric was issued its first MSOP NSC (M069-36672-00088) on March 31, 2016.

Existing Approvals

The source was issued MSOP No. 069-36672-00088 on March 31, 2016. The source has since received the following approvals:

Permit Type	Permit Number	Issuance Date
Administrative Amendment	069-38239-00088	March 21, 2017
Administrative Amendment	069-41577-00088	July 2, 2019
Administrative Amendment	069-42078-00088	November 19, 2019

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) HVAC units, as follows:
 - (1) Two (2) natural gas-fired HVAC units, identified as Units 1 and 2, constructed in 2000, permitted in 2015, with a maximum heat input capacity of 0.21 MMBtu/hr, each, exhausting outdoors.
 - (2) One (1) natural gas-fired HVAC unit, identified as Unit 3, permitted in 2019, with a maximum heat input capacity of 0.36 MMBtu/hr, exhausting outdoors.
 - (3) One (1) natural gas-fired HVAC unit, identified as Unit 4, constructed in 1998, permitted in 2015, with a maximum heat input capacity of 0.21 MMBtu/hr, exhausting outdoors.

- (4) One (1) natural gas-fired HVAC unit, identified as Unit 5, constructed in 2018, permitted in 2019, with a maximum heat input capacity of 0.21 MMBtu/hr, exhausting outdoors.
 - (5) Three (3) natural gas-fired HVAC units, identified as Units 6, 7, and 8, constructed in 1996, permitted in 2015, with a maximum heat input capacity of 0.50 MMBtu/hr, each, exhausting outdoors.
 - (6) One (1) natural gas-fired HVAC unit, identified as Unit 9, constructed in 2013, permitted in 2015, with a maximum heat input capacity of 0.30 MMBtu/hr, exhausting outdoors.
 - (7) One (1) natural gas-fired HVAC unit, identified as Unit 10, permitted in 2017, with a maximum heat input capacity of 0.10 MMBtu/hr, exhausting outdoors.
- (b) Process ovens, as follows:
- (1) One (1) natural gas-fired oven, identified as Control/Resin Oven #1, permitted in 2015, modification permitted in 2019, with a maximum capacity of 0.39 MMBtu/hr, and exhausting outdoors.
 - (2) One (1) natural gas-fired oven, identified as Vent 1 Oven #1, permitted in 2015, modification permitted in 2019, with a maximum capacity of 0.75 MMBtu/hr, and exhausting outdoors.
 - (3) One (1) natural gas-fired oven, identified as Vent 2 Oven #1, permitted in 2015, with a maximum capacity of 0.75 MMBtu/hr, and exhausting outdoors.
 - (4) One (1) natural gas-fired oven, identified as Vent 2 Oven #2, permitted in 2015, modification permitted in 2019, with a maximum capacity of 0.65 MMBtu/hr, and exhausting outdoors.
 - (5) One (1) natural gas-fired oven, identified as Control/Resin Oven #3, permitted in 2019, with a maximum capacity of 0.50 MMBtu/hr, and exhausting outdoors.
 - (6) One (1) natural gas-fired oven, identified as Control/Resin Oven #4, permitted in 2019, with a maximum capacity of 0.50 MMBtu/hr, and exhausting outdoors.
- (c) One (1) sand handling operation, identified as SAND, with a maximum capacity of 45.48 pounds per hour, constructed prior to 1970, using no control, and exhausting indoors.
- (d) One (1) Control and Resin Line, identified as CRL, constructed prior to 1970, consisting of the following:
- (1) One (1) resin filling line, with a maximum throughput of six transformers per hour, using no control and exhausting indoors.
 - (2) One (1) resin dip line, with a maximum capacity of 22 units per hour, using no control, and exhausting indoors.
- (e) One (1) Ventilation Line, identified as VENT, consisting of the following:
- (1) Vent 1 varnish dip coating operation, constructed prior to 1970, with a maximum capacity of four (4) units per hour, using no control, and exhausting indoors.
 - (2) Vent 2 resin dip coating operation, constructed prior to 1970, with a maximum capacity of four (4) units per hour, using no control, and exhausting indoors.

- (f) One (1) Welding area, identified as WELD, with a maximum capacity of 497 pounds of wire per day, constructed prior to 1970, using no control, and exhausting indoors.
- (g) Cleaners and solvents having a vapor pressure equal to or less than two kilo Pascals (2.0 kPa) measured at 38 degrees C, where the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months.
- (h) Paved roads and parking lots with public access.
- (i) Sources that consist of only the following:
 - (1) The following equipment related to manufacturing activities not resulting in the emission of HAPs, constructed prior to 1970, permitted in 2015:
 - (A) Brazing equipment.
 - (B) Soldering equipment.
- (j) Use of surface coatings using brush and roll application methods, identified as CHEM, constructed prior to 1970, permitted in 2015.

Enforcement Issue

There are no enforcement actions pending as part of this renewal.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

County Attainment Status

The source is located in Huntington County.

Pollutant	Designation
SO ₂	Nonattainment effective April 9, 2018, for the 2010 SO ₂ standard for Huntington Township. Better than national standards for the remainder of the county.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective January 16, 2018, for the 2015 8-hour ozone standard.
PM _{2.5}	Unclassifiable or attainment effective April 15, 2015, for the 2012 annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Unclassifiable or attainment effective January 29, 2012, for the 2010 NO ₂ standard.
Pb	Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.

- (a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Huntington County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
Huntington County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **SO₂**
U.S. EPA, in the Federal Register Notice 83 FR 1098 dated January 9, 2018, designated Huntington County, Huntington Township, as nonattainment for SO₂. IDEM filed a petition for reconsideration and a request for a stay to U.S. EPA on March 9, 2018. However, in order to assure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's designation. Therefore, SO₂ emissions were reviewed pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (c) **Other Criteria Pollutants**
Huntington 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).

The fugitive emissions of regulated air pollutants and hazardous air pollutants (HAP) are counted toward the determination of MSOP (326 IAC 2-6.1) 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_4g18.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.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

	Unrestricted Potential Emissions (ton/year)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Total PTE of Entire Source Excluding Fugitive Emissions*	1.86	1.72	1.72	1.70E-02	2.84	98.04	2.39	7.76	7.95
Title V Major Source Thresholds	NA	100	100	100	100	100	100	10	25
Total PTE of Entire Source Including Source-Wide Fugitives*	3.31	2.01	1.79	1.70E-02	2.84	98.04	2.39	7.76	7.95
MSOP Thresholds	25	25	25	25	25	25	< 100	< 10	< 25
¹ Under 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." ² PM _{2.5} listed is direct PM _{2.5} . ³ Single highest source-wide HAP (Glycol Ethers). *Fugitive HAP emissions are always included in the source-wide emissions.									

Appendix A of this TSD reflects the detailed unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all regulated air pollutants is less than 100 tons per year. However, VOC is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. The source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7. The source will be issued an MSOP Renewal.

Potential to Emit After Issuance

The table below summarizes the uncontrolled/unlimited potential to emit of the entire source. 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.

	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) (Uncontrolled/Unlimited)								
	PM ¹	PM ₁₀ ¹	PM _{2.5} ^{1, 2}	SO ₂	NO _x	VOC	CO	Single HAP ³	Total HAPs
Total PTE of Entire Source Excluding Fugitive Emissions*	1.86	1.72	1.72	1.70E-02	2.84	98.04	2.39	7.76	7.95
Title V Major Source Thresholds	--	100	100	100	100	100	100	10	25
Total PTE of Entire Source Including Source-Wide Fugitives*	3.31	2.01	1.79	1.70E-02	2.84	98.04	2.39	7.76	7.95
MSOP Thresholds	25	25	25	25	25	25	< 100	< 10	< 25
PSD Major Source Thresholds	250	250	250	250	250	250	250	--	--
Emission Offset Major Source Thresholds	---	NA	NA	100	NA	NA	NA	--	--
¹ Under 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." ² PM _{2.5} listed is direct PM _{2.5} . ³ Single highest source-wide HAP (Glycol Ethers). *Fugitive HAP emissions are always included in the source-wide emissions.									

Appendix A of this TSD reflects the detailed unlimited/uncontrolled emissions of the source.

- (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 stationary source under Emission Offset (326 IAC 2-3) because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more and lead (Pb) is not emitted at a rate equal to or greater 25 tons per year.
- (c) 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. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability

Federal rule applicability for this source has been reviewed as follows:

New Source Performance Standards (NSPS):

- (a) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for each of the HVAC units, because each unit has a maximum heat input capacity that is less than 10 MMBtu/hr.
- (b) The requirements of the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc and 326 IAC 12, are not included in the permit for Control/Resin Oven #3 and Control/Resin Oven #4, because the units are not steam generating units as defined at 40 CFR 60.41c. The units do not produce steam or heat water or heat any heat transfer medium.

- (c) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD and 326 IAC 20-95 are not included in the permit for Control/Resin Oven #3 and Control/Resin Oven #4, since the source is not a major source of HAP emissions and the units are not boilers or process heaters as defined at 40 CFR 63.7575.
- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ are not included in the permit for Control/Resin Oven #3 and Control/Resin Oven #4, since the units are not boilers as defined at 40 CFR 63.11237. *Boiler* means an enclosed device using controlled flame combustion in which water is heated to recover thermal energy in the form of steam and/or hot water.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63 Subpart HHHHHH, (326 IAC 20-1), are not included in the permit, since the facility does not apply spray coatings to motor vehicles or mobile equipment.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63 Subpart MMMM, (326 IAC 20-1), are not included in the permit, since the facility emits less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs, therefore it is not considered a major source of HAP and is not subject to the requirements of NESHAP MMMM.
- (h) There are no other National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

Compliance Assurance Monitoring (CAM)

- (a) 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 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

State rule applicability for this source has been reviewed as follows:

326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))

MSOP applicability is discussed under the Potential to Emit After Issuance section of this document.

326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)

PSD and Emission Offset applicability is discussed under the Potential to Emit After Issuance section of this document.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The provisions of 326 IAC 2-4.1 apply to any owner or operator who constructs or reconstructs a major source of hazardous air pollutants (HAP), as defined in 40 CFR 63.41, after July 27, 1997, unless the major source has been specifically regulated under or exempted from regulation under a NESHAP that was issued pursuant to Section 112(d), 112(h), or 112(j) of the Clean Air Act (CAA) and incorporated under 40 CFR 63. On and after June 29, 1998, 326 IAC 2-4.1 is intended to implement the requirements of Section 112(g)(2)(B) of the Clean Air Act (CAA).

The operation of this source 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)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, Clark, or Floyd County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

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)

The source is subject to the requirements of 326 IAC 6-4, because the source included roadways which have the potential to emit fugitive particulate emissions. 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 Huntington 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 Huntington County) is not subject to the requirements of 326 IAC 6.8 because it is not located in Lake County.

State Rule Applicability – Individual Facilities

State rule applicability has been reviewed as follows:

326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-1(d), indirect heating facilities which received permit to construct after September 21, 1983 are subject to the requirements of 326 IAC 6-2-4. The ten (10) natural gas-fired HVAC units, identified as Unit 1 through Unit 10, with a total heat input capacity of 2.83 MMBtu/hr, are subject to 326 IAC 6-2-4 because each units was constructed after September 21, 1983, and each meet the definition of an indirect heating unit pursuant to 326 IAC 1-2-19.

The particulate matter emissions (Pt) shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu).

Q = Total source maximum operating capacity rating in MMBtu/hr heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation.

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, Pt shall not exceed 0.6 lb/MMBtu.

Indirect Heating Units Which Began Operation After September 21, 1983						
Facility	Construction Date	Operating Capacity (MMBtu/hr)	Q (MMBtu/hr)	Calculated Pt (lb/MMBtu)	Particulate Limitation, (Pt) (lb/MMBtu)	PM PTE based on AP-42 (lb/MMBtu)
Unit 6	1996	0.50	1.50	0.98	0.60	0.002
Unit 7	1996	0.50	1.50	0.98	0.60	0.002
Unit 8	1996	0.50	1.50	0.98	0.60	0.002
Unit 4	1998	0.21	1.71	0.95	0.60	0.002
Unit 1	2000	0.21	2.13	0.89	0.60	0.002
Unit 2	2000	0.21	2.13	0.89	0.60	0.002
Unit 9	2013	0.30	2.43	0.87	0.60	0.002
Unit 10	2017	0.10	2.53	0.85	0.60	0.002
Unit 5	2018	0.21	2.74	0.84	0.60	0.002
Unit 3	2019	0.36	3.10	0.81	0.60	0.002
Where: Q = Includes the capacity (MMBtu/hr) of the new unit(s) and the capacities for those unit(s) which were in operation at the source at the time the new unit(s) was constructed.						
Note: Emission units shown in strikethrough were subsequently removed from the source. The effect of removing these units on "Q" is shown in the year the boiler was removed.						

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(14), the sand handling operations are not subject to the requirements of 326 IAC 6-3, since the pound per hour PTE for particulate matter is less than 0.551 pounds PM per hour.

Pursuant to 326 IAC 6-3-1(b)(9), the welding operations are not subject to the requirements of 326 IAC 6-3, since the welding at this source consumes less than 625 pounds of rod or wire per day.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

No single emission unit at this source is subject to 326 IAC 326 IAC 7-1.1 because each unit has a potential to emit (or limited potential to emit) sulfur dioxide (SO₂) of less than 25 tons per year or 10 pounds per hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The control/resin line (CRL), ventilation line (VENT), mold release process, air dry varnish process, and solder flux process (CHEM) are each not subject to the requirements of 326 IAC 8-1-6 because each was constructed before January 1, 1980.

Even though Control/Resin Oven #3 and Control/Resin Oven #4 were each constructed after January 1, 1980, each unit is not subject to the requirements of 326 IAC 8-1-6 because each unit has a potential to emit VOC that is less than twenty-five (25) tons per year.

326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)

Pursuant to 326 IAC 8-2-1(a)(2), the Control/Resin Line (CRL) and Ventilation Line (VENT) are each not subject to the requirements of 326 IAC 8-2-9 because each unit was constructed prior to 1970, which is prior to the 326 IAC 8-2-9 rule applicability date of January 1, 1980.

Pursuant to 326 IAC 8-2-1(a)(2), mold release process, air dry varnish process, and solder flux process (collectively identified as CHEM) are each not subject to the requirements of 326 IAC 8-2-9 because each unit was constructed prior to 1970, which is prior to the 326 IAC 8-2-9 rule applicability date of January 1, 1980.

326 IAC 9-1 (Carbon Monoxide Emission Limits)

The requirements of 326 IAC 9-1 do not apply to the emission units at this source, because this source does not operate a catalyst regeneration petroleum cracking system or a petroleum fluid coker, grey iron cupola, blast furnace, basic oxygen steel furnace, or other ferrous metal smelting equipment.

326 IAC 10-1-1 (Nitrogen Oxides Control in Clark and Floyd Counties)

Pursuant to 326 IAC 10-1-1(a), this source (located in Huntington County) is not subject to the requirements of 326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties) because it is not located in Clark or Floyd County.

326 IAC 10-2-2 (NO₂ Emissions From Large Affected Units)

Neither Control/Resin Oven #3 nor Control/Resin Oven #4 is a "unit" as defined at 326 IAC 10-2-2(20). The units are not fossil fuel-fired stationary boilers, combustion turbines, or combined cycle systems. Therefore, the ovens are not subject to the requirements of 326 IAC 10-2 (NO₂ Emissions from Large Affected Units).

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

The requirements of 326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories) do not apply to Control/Resin Oven #3 and Control/Resin Oven #4, since this units are not blast furnace gas-fired boilers, Portland cement kilns, or a facilities specifically listed under 326 IAC 10-3-1(a)(2).

326 IAC 10-5 (Nitrogen Oxide Reduction Program for Internal Combustion Engines (ICE))

Pursuant to 326 IAC 1-5-1, the requirements of 326 IAC 10-5 are not applicable to the Control/Resin Oven #3 and Control/Resin Oven #4 because the units are not large NO_x SIP Call engines or other stationary internal combustion engines subject to NO_x control under a compliance plan under 326 IAC 10-5-3.

Compliance Determination and Monitoring Requirements

There are no compliance requirements applicable to this source.

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 1, 2020.

The operation of this stationary power, distribution, and specialty transformer manufacturing operation shall be subject to the conditions of the attached proposed MSOP Renewal No. M069-43232-00088.

The staff recommends to the Commissioner that the MSOP Renewal be approved.

IDEM Contact

- (a) If you have any questions regarding this permit, please contact Travis Flock, 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) 233-1782 or (800) 451-6027, and ask for Travis Flock or (317) 233-1782.
- (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
PTE Summary**

Company Name: Schneider Electric
Source Address: 6 Commercial Road, Huntington, Indiana 46750
MSOP Renewal No.: M069-42323-00088
Reviewer: Travis Flock

Uncontrolled Potential to Emit (tons/yr)							
Emission Unit/ID	PM	PM ₁₀	PM _{2.5} ¹	SO ₂	NOx	VOC	CO
Natural gas-fired HVAC units (HVAC)	2.51E-02	0.10	0.10	7.93E-03	1.32	7.26E-02	1.11
Natural gas-fired ovens (OVENS)	2.89E-02	0.12	0.12	9.12E-03	1.52	8.36E-02	1.28
Sand handling operation (SAND)	0.36	5.38E-02	5.38E-02	--	--	--	--
Control and Resin Line (CRL)	--	--	--	--	--	27.52	--
Ventilation Line (VENT)	--	--	--	--	--	58.17	--
Chemical Use (Mold release, thinners, varnish) (CHEM)	--	--	--	--	--	12.20	--
Welding area (WELD)	1.45	1.45	1.45	--	--	--	--
Brazing, Soldering, Silica, Dust Fugitives (FUG)	--	--	--	--	--	--	--
Total excluding fugitives ²	1.86	1.72	1.72	1.70E-02	2.84	98.04	2.39
Paved Roads	1.44	0.29	7.08E-02	--	--	--	--
Total	3.31	2.01	1.79	1.70E-02	2.84	98.04	2.39

Notes:

1. PM_{2.5} is direct PM_{2.5}
2. Total excluding fugitives for determining Part 70 and PSD applicability

**Appendix A: Emission Calculations
HAP Summary**

Company Name: Schneider Electric
Source Address: 6 Commercial Road, Huntington, Indiana 46750
MSOP Renewal No.: M069-42323-00088
Reviewer: Travis Flock

Uncontrolled Potential to Emit (tons/yr)						
Emission Unit	HVAC	OVENS	VENT	Chemical Use	WELD	Combined
Organic HAPs						
Benzene	2.77E-05	3.19E-05	-	-	-	5.97E-05
Dichlorobenzene	1.59E-05	1.82E-05	-	-	-	3.41E-05
Ethylbenzene	-	-	-	3.55E-02	-	3.55E-02
Formaldehyde	9.91E-04	1.14E-03	-	-	-	2.13E-03
Glycol Ethers	-	-	7.76	-	-	7.76
n-Hexane	2.38E-02	2.74E-02	-	-	-	5.11E-02
Methanol	-	-	-	4.51E-03	-	4.51E-03
Naphthalene	-	-	-	4.73E-03	-	4.73E-03
Toluene	4.49E-05	5.17E-05	-	-	-	9.66E-05
Xylenes	-	-	-	9.15E-02	-	9.15E-02
Inorganic HAPs						
Cadmium	1.45E-05	1.67E-05	-	-	-	3.13E-05
Chromium	1.85E-05	2.13E-05	-	-	1.53E-05	5.51E-05
Lead	6.60E-06	7.60E-06	-	-	-	1.42E-05
Manganese	5.02E-06	5.78E-06	-	-	4.87E-03	4.89E-03
Nickel	2.77E-05	3.19E-05	-	-	1.53E-05	7.50E-05
Total Emissions	2.49E-02	2.87E-02	7.76	0.14	4.91E-03	7.95

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Schneider Electric
Source Address: 6 Commercial Road, Huntington, Indiana 46750
MSOP Renewal No.: M069-42323-00088
Reviewer: Travis Flock

Description	Unit ID	Construction Year	Number	Capacity (MMBtu/hr)	
				Unit	Total
HVAC Unit	1	2000	1	0.21	0.21
HVAC Unit	2	2000	1	0.21	0.21
HVAC Unit	3	2019	1	0.36	0.36
HVAC Unit	4	1998	1	0.21	0.21
HVAC Unit	5	2018	1	0.21	0.21
HVAC Unit	6	1996	1	0.50	0.50
HVAC Unit	7	1996	1	0.50	0.50
HVAC Unit	8	1996	1	0.50	0.50
HVAC Unit	9	2013	1	0.30	0.30
HVAC Unit	10	2017	1	0.10	0.10
Total					3.08

Heat Input Capacity	HHV	Potential Throughput
MMBtu/hr	MMBtu	MMCF/yr
3.08	1020	26.42

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM ₁₀ *	direct PM _{2.5} *	SO ₂	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
Potential Emission in tons/yr	2.51E-02	0.10	0.10	7.93E-03	**see below	7.26E-02	1.11

*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					
	Benzene	Dichlorobenzene	Formaldehyde	n-Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	2.77E-05	1.59E-05	9.91E-04	2.38E-02	4.49E-05	2.49E-02

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	6.60E-06	1.45E-05	1.85E-05	5.02E-06	2.77E-05	7.24E-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.

Total HAPs	2.49E-02
Worst HAP	2.38E-02

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: Schneider Electric
Source Address: 6 Commercial Road, Huntington, Indiana 46750
MSOP Renewal No.: M069-42323-00088
Reviewer: Travis Flock

Description	Unit ID	Construction (Modification) Year	Number	Capacity (MMBtu/hr)	
				Unit	Total
Control/Resin Oven	#1	1970 (2019)	1	0.39	0.39
Vent 1 Oven	#1	1970 (2019)	1	0.75	0.75
Vent 2 Oven	#1	1970	1	0.75	0.75
Vent 2 Oven	#2	1970 (2019)	1	0.65	0.65
Control/Resin Oven	#3	2019	1	0.50	0.50
Control/Resin Oven	#4	2019	1	0.50	0.50
Total					3.54

Heat Input Capacity MMBtu/hr	HHV MMBtu	Potential Throughput MMCF/yr
	MMCF	
3.54	1020	30.40

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM ₁₀ *	direct PM _{2.5} *	SO ₂	NOx 100 **see below	VOC	CO
Potential Emission in tons/yr	0.03	0.12	0.12	0.01	1.52	0.08	1.28

*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					
	Benzene	Dichlorobenzene	Formaldehyde	n-Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.10E-03	1.20E-03	7.50E-02	1.80E+00	3.40E-03	
Potential Emission in tons/yr	3.19E-05	1.82E-05	1.14E-03	2.74E-02	5.17E-05	2.86E-02

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	7.60E-06	1.67E-05	2.13E-05	5.78E-06	3.19E-05	8.33E-05
					Total HAPs	2.87E-02
					Worst HAP	2.74E-02

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
PM and VOC Emissions from Control and Resin Line**

Company Name: Schneider Electric
Source Address: 6 Commercial Road, Huntington, Indiana 46750
MSOP Renewal No.: M069-42323-00088
Reviewer: Travis Flock

Material	Density (Lb/Gal)	Weight % VOC ¹	Weight % HAPs	Weight % Solids	Resin Usage (lb/unit)	Resin Usage (gal/unit)	Max Production (unit/hour)	Max Operating Schedule (hr/yr)	Max Resin Usage (gal/yr)	Pounds VOC per gallon of material (lb/gal)	Potential VOC pounds per hour (lb/hr)	Potential VOC pounds per day (lb/day)	Potential VOC (ton/yr)	Potential PM ² pounds per hour (lb/hr)	Potential PM ² (ton/yr)	Transfer Efficiency ³
Resin Units - Resin Filling Operation	8.58	12.8%	0.0	73.0%	7.00	0.82	6.0	8,760	42,859	1.10	5.38	129.16	23.57	-	-	100%
Control Units - Resin Dip Operation ⁴	8.58	12.8%	0.0	73.0%	0.32	0.04	22.0	8,760	7,184	1.10	0.90	21.65	3.95	-	-	100%
Total Potential to Emit:											6.28	150.81	27.52	-	-	

NOTES:

¹ Weight % VOC for Resin was provided by vendor.

² Assumed PM = PM₁₀ = PM_{2.5}

³ Assume transfer efficiency = 100%

⁴ Assembled transformer modules are placed into a tank that is then closed and filled with resin. After a set time per product, the tank is drained and the module is removed and sent to one of the curing ovens.

METHODOLOGY:

Pounds of VOC per Gallon Material = (Density (lb/gal) * Weight % VOC

Potential VOC Pounds per Hour = Pounds of VOC per Gallon Material (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon Material (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon Material (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Potential HAP Pounds per Hour = Density (lb/gal) * Weight % HAPS (%) * Resin Usage (gal/unit) * Max Production (unit/hour)

Potential HAP Tons per Year = Potential HAP Pounds per Hour (lb/hr) * Max Operating Schedule (hr/yr) * (1 ton/2000 lbs)

Potential PM Pounds per Hour = Density (lb/gal) * Weight % Solids (%) * Resin Usage (gal/unit) * Max Production (unit/hour) * (1-Transfer Efficiency (%))

Potential PM Tons per Year = Maximum (units/hour) * Gal of Material (gal/unit) * Density (lb/gal) * (Weight % Solids) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

**Appendix A: Emissions Calculations
PM, VOC, and HAP Emissions from Ventilation Line**

Company Name: Schneider Electric
Source Address: 6 Commercial Road, Huntington, Indiana 46750
MSOP Renewal No.: M069-42323-00088
Reviewer: Travis Flock

Material	Density (Lb/Gal)	Weight % VOC ¹	Weight % Solids	Resin Usage (lb/unit)	Resin Usage (gal/unit)	Maximum (unit/hour)	Max Operating Schedule	Pounds VOC per gallon of material (lb/gal)	Potential VOC pounds per hour (lb/hr)	Potential VOC pounds per day (lb/day)	Potential VOC (ton/yr)	Potential PM ² pounds per hour (lb/hr)	Potential PM ² (ton/yr)	Transfer Efficiency
Vent 1: Varnish Dip Coating	8.64	32.4%	28.0%	5.50	0.64	4.0	8,760	2.80	7.13	171.11	31.23	-	-	100%
Vent 2: Resin Dip Coating	8.58	12.8%	73.0%	12.00	1.40	4.0	8,760	1.10	6.15	147.62	26.94	-	-	100%
Worst Case Potential to Emit:									7.13	171.11	58.17	-	-	

Material	HAP Composition		HAP Emissions	
	Weight % Glycol Ethers	Pounds Glycol Ethers per gallon of material (lb/gal)	Potential Glycol Ethers pounds per hour (lb/hr)	Potential Glycol Ethers (ton/yr)
Vent 1: Varnish Dip Coating	8.1%	0.70	1.77	7.76
Vent 2: Resin Dip Coating	-	-	-	-
Total Potential to Emit:			1.77	7.76

NOTES:

¹ Weight % VOC for Varnish and Resin operations were provided by vendor.

² Assumed PM = PM₁₀ = PM_{2.5}

METHODOLOGY FOR VOC & PM:

Pounds of VOC per Gallon Material = (Density (lb/gal) * Weight % VOC

Potential VOC Pounds per Hour = Pounds of VOC per Gallon Material (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon Material (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon Material (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Potential PM Pounds per Hour = Density (lb/gal) * Weight % Solids (%) * Resin Usage (gal/unit) * Max Production (unit/hour) * (1-Transfer Efficiency (%))

Potential PM Tons per Year = Maximum (units/hour) * Gal of Material (gal/unit) * Density (lb/gal) * (Weight % Solids) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Total Potential to Emit = Maximum of "Resin Dip Coating Operation 1" or "Varnish Dip Coating" + Total for "Resin Dip Coating Operation 2"

METHODOLOGY FOR HAP:

Pounds of Glycol Ethers per Gallon Material = Density (lb/gal) * Weight % Glycol Ethers

Potential Glycol Ethers Pounds per Hour = Pounds of Glycol Ethers per Gallon Material (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential Glycol Ethers Tons per Year = Pounds of Glycol Ethers per Gallon Material (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Total Potential to Emit = Maximum of "Resin Dip Coating Operation 1" or "Varnish Dip Coating" + Total for "Resin Dip Coating Operation 2"

**Appendix A: Emissions Calculations
PM, VOC, and HAP Emissions from Chemical Use**

Company Name: Schneider Electric
Source Address: 6 Commercial Road, Huntington, Indiana 46750
MSOP Renewal No.: M069-42323-00088
Reviewer: Travis Flock

Chemical	Density ¹ (lb/gal)	Max Usage Rate (gal/hr)	Max Operating Schedule (hr/yr)	Weight % VOC ¹	Weight % Solids ¹	Weight % Ethylbenzene ¹	Weight % Methanol ¹	Weight % Naphthalene ¹	Weight % Xylenes ¹	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (ton/yr)	Potential PM ² (lb/hr)	Potential PM ² (ton/yr)	Transfer Efficiency (%)	HAPs																														
																Potential Ethylbenzene (lb/hr)	Potential Methanol (lb/hr)	Potential Naphthalene (lb/hr)	Potential Xylenes (lb/hr)	Potential Ethylbenzene (ton/yr)	Potential Methanol (ton/yr)	Potential Naphthalene (ton/yr)	Potential Xylenes (ton/yr)	Total HAPs (ton/yr)																						
Mold Release																																														
MR5 Mold Release ³	6.91	0.02	8,760	83.0%	17.0%	5.0%	-	1.0%	5.0%	0.090	2.15	0.39	0	0	100%	5.40E-03	-	1.08E-03	5.40E-03	2.36E-02	-	4.73E-03	2.36E-02	0.052																						
MS-145W Mold Release ⁴	8.42	0.01	8,760	2.5%	0%	-	-	-	-	2.69E-03	0.065	0.01	0	0	100%	-	-	-	-	2.36E-02	-	4.73E-03	2.36E-02	-																						
<i>Total of the mold release process</i>											0.09	2.22	0.40	0	0						2.36E-02		4.73E-03	2.36E-02	5.20E-02																					
Varnish																																														
T-100 Thinner ⁵	6.67	0.19	8,760	100.0%	0%	-	-	-	-	1.28	30.79	5.62	0	0	100%																															
191 Thinner ⁶	7.94	0.17	8,760	99.0%	1.0%	-	-	-	-	1.31	31.43	5.74	0	0	100%																															
AC-43 Air Dry Varnish ⁷	8.00	0.01	8,760	55.6%	44.4%	3.1%	-	-	17.7%	0.049	1.17	0.21	0	0	100%	2.70E-03			1.55E-02	1.18E-02			6.79E-02	7.97E-02																						
<i>Total of the varnish process</i>											2.64	63.39	11.57	0	0						1.18E-02			6.79E-02	7.97E-02																					
Solder Flux																																														
Solder Flux	7.76	0.01	8,760	49.4%	45.0%	-	1.0%	-	-	0.051	1.22	0.22	0	0	100%		1.03E-03					4.51E-03		4.51E-03																						
METHODOLOGY FOR VOC, PM & HAPs:											<table border="1"> <tr> <td>Unrestricted Potential to Emit:</td> <td>2.78</td> <td>66.83</td> <td>12.20</td> <td>0</td> <td>0</td> <td></td> <td>3.55E-02</td> <td>4.51E-03</td> <td>4.73E-03</td> <td>9.15E-02</td> <td>0.14</td> </tr> </table>											Unrestricted Potential to Emit:	2.78	66.83	12.20	0	0															3.55E-02	4.51E-03	4.73E-03	9.15E-02	0.14
Unrestricted Potential to Emit:	2.78	66.83	12.20	0	0															3.55E-02	4.51E-03	4.73E-03	9.15E-02	0.14																						

Potential VOC Pounds per Hour = Density (lb/gal) * Max Usage Rate (gal/hr) * Weight % VOC (%)
 Potential VOC Tons per Year = Potential VOC (lb/hr) * Max Operating Schedule (hr/yr) * (1 ton/2000 lbs)
 Potential PM Pounds per Hour = Density (lb/gal) * Weight % Solids (%) * Max Usage Rate (gal/hr) * (1-Transfer Efficiency (%))
 Potential PM Tons per Year = Potential PM (lb/hr) * Max Operating Schedule (hr/yr) * (1 ton/2000 lbs)
 Potential HAPs Pounds per Hour = Density (lb/gal) * Max Usage Rate (gal/hr) * Weight % of HAP (%)
 Potential HAPs Tons per Year = Potential HAPs (lb/hr) * Max Operating Schedule (hr/yr) * (1 ton/2000 lbs)

Notes:
 VOC Rules under 326 IAC 8 do not apply to the following operations since VOC emissions are less than 15 lb/day: MR5 Mold Release³, MS-145W Mold Release⁴, AC-43 Air Dry Varnish⁷, & Solder Flux

¹ Density and Composition were based on MSDS for chemical.
² Assumed PM = PM₁₀ = PM_{2.5}
³ Max usage rate for MR5 Mold Release: 1 cup of this chemical is used each time. Length of use is 4 hours. To estimate max usage rate (gal/hr): 1 cup/16 cups per gallon/4 hours.
⁴ Max usage rate for MS-145W Mold Release: this chemical is used daily for approximately 3 hours at a time. Additionally, max annual usage was 14 gal/yr in 2011 based on data from 2010-2014. To estimate max usage rate (gal/hr): 14 gal per year/365 days per year/3 hrs per day.
⁵ Max usage rate for T-100 Thinner: this chemical is used 1 time each week. It's dispensed into air dry varnish, so length of time is minimal. Assumed 1 hour of use each time. Additionally, max annual usage was 10 gal/yr in 2014 (not used during 2010-2013). To estimate max usage rate (gal/hr): 10 gallons per year/52 days per year/1 hr per day.
⁶ Max usage rate for 191 Thinner: this chemical is used only 3x/year to clean brushes used on a specific product. Assumed 1 hour use each time. Additionally, max annual usage was 2 quarts/yr in 2014 (not used during 2010-2013). To estimate max usage rate (gal/hr): 2 quarts/4 quarts per gallon/3 days per year/1 hr per day.
⁷ Density, Weight % VOC, Weight % Solids, and Weight % HAPs for Synthite AC-43 Air Dry Varnish were provided by vendor. Max usage rate: this is used daily approximately 2 hours at a time. Additionally, max annual usage was 8 gal/yr in 2014 based on data during 2010-2014. To estimate max usage rate (gal/hr): 8 gal per year/365 days per year/2 hrs per day.
⁸ Max usage rate for Solder Flux conservatively assumed all solder flux was used for welding resin units, which had the most conservative welding rate compared to control and vent units. Max usage rate (gal/hr) was based on highest of historical years during 2010-2014, with 2010 being the highest. Thus, max usage rate (gal/hr) = (18 lb per year in 2010/7.76 lb per gal/0.5 min per resin unit/20957 resin units in 2010)/60 min per hr.

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: Schneider Electric
Source Address: 6 Commercial Road, Huntington, Indiana 46750
MSOP Renewal No.: M069-42323-00088
Reviewer: Travis Flock

Process	Number of Stations	Maximum electrode consumption per station (lbs/hr)	Maximum electrode consumption per station (lbs/day)	Emission Factors ¹ (lb pollutant/lb electrode)				Potential to Emit (lbs/hr)				HAPs (lbs/hr)	
				PM/PM ₁₀ /PM _{2.5}	Mn	Ni	Cr	PM/PM ₁₀ /PM _{2.5}	Mn	Ni	Cr		
Welding and Brazing													
Metal Inert Gas (MIG) (aluminum, ER5356 wire)	1	2.97	71.28	0.0723				0.21	0	0	0		0
MIG (carbon steel, ER70S wire)	1	3.5	84	0.0052	3.18E-04	1.00E-06	1.00E-06	1.82E-02	1.11E-03	3.50E-06	3.50E-06		1.12E-03
MIG (copper, ERCuA1-A2)	1	8.95	214.8	0.0081				7.25E-02	0	0	0		0
Phosphorus/Copper/Silver Brazing (ERCu)	1	5.3	127.2	0.0049				2.60E-02	0	0	0		0
Totals													
Potential to Emit (lbs/hr)								0.33	1.11E-03	3.50E-06	3.50E-06		1.12E-03
Potential to Emit (lbs/day)								7.95	2.67E-02	8.40E-05	8.40E-05		2.69E-02
Potential to Emit (tons/year)								1.45	4.87E-03	1.53E-05	1.53E-05		4.91E-03

Notes:

1. Emission factor sources:

MIG welding, carbon steel - AP-42 Tables 12.19-1 and 12.19-2 (1/95)

Other processes - IDEM OAQ Permits Branch reference "welding&flamecutting.pdf"

Methodology:

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/day) = 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)

Company Name: Schneider Electric
Source Address: 6 Commercial Road, Huntington, Indiana 46750
MSOP Renewal No.: M069-42323-00088
Reviewer: Travis Flock

Source	PM/PM ₁₀ /PM _{2.5} Emissions ^{1,2} (lb/yr)	PM/PM ₁₀ /PM _{2.5} Emissions ^{1,2} (ton/yr)
Brazing Fumes	0.00013	6.69E-08
Flux/Solder	2.42E-05	1.21E-08
Respirable Nuisance Dust	2.14E-04	1.07E-07
Crystalline Silica (Quartz)	3.20E-05	1.60E-08
Total Dust	0.0012	6.09E-07
Total PM Emissions	1.62E-03	8.11E-07

Brazing Fumes

2013 Brazing Usage (lb)⁶ 3,573
 Max Brazing Usage (lb)^{5,6} 4,354

Parameters	Units	Aluminum	Copper	Tin	Silver
Monitored Amount (highest sample) ³	(mg/m3)	0.03	0.014	0.0021	0.0035
Exposure Time ³	(minutes)	490	490	490	436
Air Flow Rate	(liters/minute)	1.91	1.91	1.91	1.98
Volume ³	(liters)	933	933	933	862
Concentration	(lb/liters)	6.61386E-11	3.08647E-11	4.6297E-12	7.71617E-12
Annual Release	(lb/yr)	0.000066	0.000031	0.000005	0.000008
Max Annual Release ⁴	(lb/yr)	0.000081	0.000038	0.000006	0.000010

Solder Fumes

2013 Solder Usage (lb) 96
 Max Solder Usage (lb)⁵ 117

Parameters	Units	Copper
Monitored Amount (highest sample) ³	(mg/m3)	0.008
Exposure Time ³	(minutes)	447
Air Flow Rate	(liters/minute)	2.20
Volume ³	(liters)	982
Concentration	(lb/liters)	1.7196E-11
Annual Release	(lb/yr)	0.000020
Max Annual Release ⁴	(lb/yr)	0.000024

Respirable Nuisance Dust

2013 Sand Usage (lb)⁷ 215,000
 Max Sand Usage (lb)⁵ 236,500

Facility Fugitive Releases	Units	Total Dust
Monitored Amount (highest sample) ³	(mg/m3)	0.07
Exposure Time ³	(minutes)	455
Air Flow Rate	(liters/minute)	2.51
Volume ³	(liters)	1,143
Concentration	(lb/liters)	1.4771E-10
Annual Release	(lb/yr)	0.00019
Max Annual Release ⁴	(lb/yr)	0.00021

Crystalline Silica (Quartz)

2013 Sand Usage (lb)⁸ 215,000
 Max Sand Usage (lb)⁵ 236,500

Facility Fugitive Releases	Units	Total Dust
Monitored Amount (highest sample) ³	(mg/m3)	0.01
Exposure Time ³	(minutes)	455
Air Flow Rate	(liters/minute)	2.51
Volume ³	(liters)	1,143
Concentration	(lb/liters)	2.20462E-11
Annual Release	(lb/yr)	0.000029
Max Annual Release ⁴	(lb/yr)	0.00003

Total Dust

2013 Labor Hours (lb) 316,891
 Max Labor Hours (lb)⁵ 386,090

Facility Fugitive Releases	Units	Total Dust
Monitored Amount (highest sample) ³	(mg/m3)	0.47
Exposure Time ³	(minutes)	464
Air Flow Rate	(liters/minute)	1.84
Volume ³	(liters)	852
Concentration	(lb/liters)	1.03617E-09
Annual Release	(lb/yr)	0.0010
Max Annual Release ⁴	(lb/yr)	0.0012

Notes:

- ¹ Assumed PM = PM₁₀ = PM_{2.5}.
- ² PM emission factors for Brazing, Soldering, Total Dust, Respirable Nuisance Dust, and Crystalline Silica (Quartz) emissions were unavailable. Based emissions on Industrial Hygiene Air Sampling and Noise Dosimetry Survey - Final Report dated December 3, 2013 (513137rpt_2013 Hygiene report 10-30-2013.pdf), but ratioed for max usage/labor hours.
- ³ Monitored Amount (highest sample), Exposure Time, and Volume were obtained from Industrial Hygiene report.
- ⁴ Max Annual Release was estimated by multiplying annual release by ratio of max usage/labor hours to usage/labor hours in 2013.
- ⁵ Max usage/labor hours were based on highest usage/labor hours from 2011-2014 Toxic Release Inventories, plus 10% contingency for potential increase in usage.
- ⁶ Brazed materials include copper and aluminum wire used in welding operation, which includes aluminum bare wire, carbon steel wire, copper alloy bare wire, and phosphorus/copper/silver brazing filler metal.
- ⁷ Location of highest respirable dust was within Resin II Sand Dispensing area.
- ⁸ Location of highest quartz was within Resin II Sand Dispensing area.

Appendix A: Emission Calculations
Fugitive Dust Emissions - Paved Roads

Company Name: Schneider Electric
Source Address: 6 Commercial Road, Huntington, Indiana 46750
MSOP Renewal No.: M069-42323-00088
Reviewer: Travis Flock

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)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Raw Material Deliveries (inbound) - Compressed & Bulk Gas	0.1	1	0.1	40.0	5.9	735	0.139	0.0	7.5
Raw Material Deliveries (outbound) - Compressed & Bulk Gas	0.1	1	0.1	40.0	5.9	585	0.111	0.0	6.0
Raw Material Deliveries (inbound) - Warehouse	12.0	1	12.0	40.0	480.0	405	0.077	0.9	336.0
Excess Raw Material & Finished Goods (outbound) - Warehouse	12.0	1	12.0	40.0	480.0	255	0.048	0.6	211.5
Scrap Removal (inbound)	0.1	1	0.1	20.0	2.9	735	0.139	0.0	7.3
Scrap Removal (outbound)	0.1	1	0.1	40.0	5.7	585	0.111	0.0	5.8
Returned Product Deliveries (inbound)	12.0	1	12.0	40.0	480.0	405	0.077	0.9	336.0
Totals			36.6		1460.4			2.5	910.0

Average Vehicle Weight Per Trip = 37.1 tons/trip
 Average Miles Per Trip = 0.04 miles/trip

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

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMT = particle size multiplier (AP-42 Table 13.2.1-1)
W =	37.1	37.1	37.1	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m ² = Ubiquitous silt loading value for paved roads - (AP-42 Table 13.2.1-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [1 - (p/4N)]$ (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor, $E_{ext} = E_f * [1 - (p/4N)]$
 where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)
 N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	3.468	0.694	0.1703	lb/mile
Mitigated Emission Factor, $E_{ext} =$	3.171	0.634	0.1557	lb/mile

Process	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Raw Material Deliveries (inbound) - Compressed & Bulk Gas	1.20E-02	2.39E-03	5.87E-04
Raw Material Deliveries (outbound) - Compressed & Bulk Gas	9.51E-03	1.90E-03	4.67E-04
Raw Material Deliveries (inbound) - Warehouse	5.33E-01	1.07E-01	2.62E-02
Excess Raw Material & Finished Goods (outbound) - Warehouse	3.35E-01	6.71E-02	1.65E-02
Scrap Removal (inbound)	1.15E-02	2.30E-03	5.65E-04
Scrap Removal (outbound)	9.16E-03	1.83E-03	4.50E-04
Returned Product Deliveries (inbound)	5.33E-01	1.07E-01	2.62E-02
Totals	1.44	0.29	0.07

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Unmitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] * [Mitigated Emission Factor (lb/mile)] * (ton/2000 lbs)
 Controlled PTE (tons/yr) = [Mitigated PTE (tons/yr)] * [1 - Dust Control Efficiency]

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particle Matter (<2.5 um)
 PTE = Potential to Emit



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

September 24, 2020

Sandra Merritt
Schneider Electric
6 Commercial Road
Huntington, IN 46750

Re: Public Notice
Schneider Electric
Permit Level: MSOP - Renewal
Permit Number: 069-43232-00088

Dear Ms. Sandra Merritt:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, **are available electronically at:**

IDEM's online searchable database: <http://www.in.gov/apps/idem/caats/> . Choose Search Option by **Permit Number**, then enter permit 43232

and

IDEM's Virtual File Cabinet (VFC): <http://www.IN.gov/idem>. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

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 Huntington City Township Public Library, 255 West Park Drive in Huntington, IN 46750. 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 draft permit 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 Travis Flock, 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 3-1782 or dial (317) 233-1782.

Sincerely,

Kathy Bourquein

Kathy Bourquein
Permits Branch
Office of Air Quality

Enclosures

PN Applicant Cover Letter access via website 8/10/2020



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

September 24, 2020

To: Huntington City Township Public Library

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

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

Applicant Name: Schneider Electric
Permit Number: 069-43232-00088

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

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

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

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

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

Enclosures
PN Library updated 4/2019



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

September 24, 2020
Schneider Electric
069-43232-00088

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 Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@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 2/28/2020

Mail Code 61-53

IDEM Staff	KBOURQUE 9/24/2020 Schneider Electric 069-43232-00088 (draft) Page 1 of 2		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Sandra Merritt Schneider Electric 6 Commercial Rd Huntington IN 46750 (Source CAATS)										
2		Jim Harden Plant Manager Schneider Electric 6 Commercial Rd Huntington IN 46750 (RO CAATS)										
3		Huntington Town Council and Mayors Office 300 Cherry St. Huntington IN 46750 (Local Official)										
4		Huntington County Board of Commissioners 201 N. Jefferson Street Huntington IN 46750 (Local Official)										
5		Frederick & Iva Moore 6019 W 650 N Ligonier IN 46767 (Affected Party)										
6		Ms. Mary Shipley 10968 E 100 S Marion IN 46953 (Affected Party)										
7		Huntington County Health Department 1330 S Jefferson Street Huntington IN 46750 (Health Department)										
8		Melvin & Deborah Gillespie 5616 N 200 E Huntington IN 46750 (Affected Party)										
9		Huntington City-Township Public Library 255 W Park Dr Huntington IN 46750 (Library)										
10		M & S Industrial Metal Fabricators, Inc. 5 Commercial Road Huntington IN 46750 (Affected Party)										
11		Shuttleworth LLC 10 Commercial Road Huntington IN 46750 (Affected Party)										
12		Thompson Properties LLC 9 Commercial Road Huntington IN 46750 (Affected Party)										
13		Innovative Packaging Associates 1324 Flaxmill Road Huntington IN 46750 (Affected Party)										
14		Wayne Grisby 3805 Vermillion Cliffs Fort Wayne IN 46814 (Affected Party)										
15		Jonathan Schenkel 11708 N. Ogden Drive Syracuse IN 46567-8809 (Affected Party)										

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 mil 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 inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Mail Code 61-53

IDEM Staff	KBOURQUE 9/24/2020 Schneider Electric 069-43232-00088 (draft) Page 2 of 2			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Schenkels All-Star Dairy PO Box 642 Huntington IN 46750 (Affected Party)									
2		Suiza Dairy Group, LLC 1019 Flaxmill Road Huntington IN 46750 (Affected Party)									
3		Rita and Paul Kulb 1001 Flaxmill Road Huntington IN 46750 (Affected Party)									
4		Lisa Green The Journal Gazette 600 W Main St Fort Wayne IN 46802 (Affected Party)									
5											
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15											

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 mil 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 inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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