

**MINOR SOURCE OPERATING PERMIT  
INDIANA DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT OFFICE OF AIR QUALITY  
and  
VIGO COUNTY AIR POLLUTION CONTROL**

**Emery Winslow Scale  
4530 North 25<sup>th</sup> Street  
Terre Haute, Indiana 47805**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units 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.

Operation Permit No.: MSOP 167-11852-00122	
Issued by: <i>George M. Needham</i> George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: October 6, 2005 Expiration Date: October 6, 2010

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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) and Vigo County Air Pollution Control (VCAPC). 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 industrial scale manufacturing plant.

Authorized Individual: Jim Evinger, Production Manager  
Source Address: 4530 North 25<sup>th</sup> Street, Terre Haute, Indiana 47805  
Mailing Address: 4530 North 25<sup>th</sup> Street, Terre Haute, Indiana 47805  
General Source Phone: 812-466-5265  
SIC Code: 3596 (NAICS 333997)  
County Location: Vigo  
Source Location Status: Basic nonattainment for ozone under the 8-hour standard  
Attainment for ozone under the 1-hour standard  
Maintenance attainment for sulfur dioxide  
Attainment area for all other criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD, Emission Offset Rules; and  
Nonattainment NSR  
Minor Source, Section 112 of the Clean Air Act  
Not 1 of 28 Source Categories

### A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) paint room utilizing an airless air assist spray gun, constructed in 1956, with a maximum capacity of 2.5 gallons of paint per hour, using dry filters as control, and exhausting to three (3) 24" diameter stacks.
- (b) One (1) Powrmatic Model TE-41 natural gas-fired furnace with a heat input of 2.2 MMBtu/hr.
- (c) Five (5) Solartronics natural gas-fired radiant heat tubes, each with a heat input of 0.125 MMBtu/hr.
- (d) Eight (8) Solartronics natural gas-fired heaters, each with a heat input of 85 Btu/hr.
- (e) Seven (7) metal inert gas (MIG) welders.
- (f) Four (4) tungsten inert gas (TIG) welders.
- (g) One (1) MAAP gas welder.

**SECTION B GENERAL CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

**B.1 Permit No Defense [IC 13]**

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

**B.2 Definitions**

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.3 Effective Date of the Permit [IC13-15-5-3]**

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

**B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) 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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

**B.5 Modification to Permit [326 IAC 2]**

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

**B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

- (a) Annual notification shall be submitted to the Office of Air Quality and Vigo County Air Pollution Control stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

and

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, IN 47807

- (d) 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, and VCAPC on or before the date it is due.

**B.7 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:
- (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 Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

and

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, and VCAPC upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and VCAPC. IDEM, OAQ, and VCAPC may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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(a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.

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

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

and

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ and VCAPC within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

(d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

**B.9 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]  
[IC13-17-3-2][IC 13-30-3-1]**

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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, and VCAPC, 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 this title or the conditions of this permit or any operating permit revisions;

(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 processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(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.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]**

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Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and VCAPC, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, and VCAPC shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

**B.11 Annual Fee Payment [326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to VCAPC within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call VCAPC at 462-3433 to determine the appropriate permit fee.

**B.12 Credible Evidence [326 IAC 1-1-6]**

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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

**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 and VCAPC, 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 5-1-3 (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 non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.4 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.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or

not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (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 Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

## Testing Requirements

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

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

and

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47805

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ and VCAPC of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and VCAPC not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and VCAPC, 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.7 Compliance Requirements [326 IAC 2-1.1-11]

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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

### C.8 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

### C.9 Compliance Response Plan - Preparation and Implementation

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and VCAPC upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the

Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ and VCACP of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.10 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 take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

## Record Keeping and Reporting Requirements

### C.11 Malfunctions Report [326 IAC 1-6-2]

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), VCAPC, or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ and VCAPC using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (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.12 General Record Keeping Requirements [326 IAC 2-6.1-5]

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- (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 or VCPAC makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or VCAPC within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

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

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- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204

and

Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807

- (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, and VCAPC on or before the date it is due.

- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## SECTION D.1 EMISSIONS UNITS OPERATION CONDITIONS

**Emissions Unit Description:** One (1) paint room utilizing an airless air assist spray gun, constructed in 1956, with a maximum capacity of 2.5 gallons of paint per hour, using dry filters as control, and exhausting to three (3) 24" diameter stacks.

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

### Emission Limitations and Standards

#### D.1.1 Particulate [326 IAC 6-3-2(d)]

- (a) Pursuant to 326 IAC 6-3-2(d) particulate from the surface coating processes shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

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

### Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

#### D.1.3 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 the Permittee shall maintain a record of inspections and any actions taken as required by Condition D.1.1.
- (b) To document compliance with Condition D.1.1, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

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

**And**

**VIGO COUNTY AIR POLLUTION CONTROL**

**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).

<b>Company Name:</b>	<b>Emery Winslow Scale</b>
<b>Address:</b>	<b>4530 North 25<sup>th</sup> Street</b>
<b>City:</b>	<b>Terre Haute, Indiana</b>
<b>Phone #:</b>	<b>812-466-5265</b>
<b>MSOP #:</b>	<b>167-11852-00122</b>

I hereby certify that Emery Winslow Scale is  still in operation.  
 no longer in operation.

I hereby certify that Emery Winslow Scale is  in compliance with the requirements of MSOP 167-11852-00122.  
 not in compliance with the requirements of MSOP 167-11852-00122.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER - 317 233-5967**

**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 ?\_\_\_\_\_, 100TONS/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 PERM 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: \_\_\_\_/\_\_\_\_/19 \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/19 \_\_\_\_\_ 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:

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**Indiana Department of Environmental Management  
Office of Air Quality  
And Vigo County Air Pollution Control**

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

**Source Background and Description**

<b>Source Name:</b>	<b>Emery Winslow Scale</b>
<b>Source Location:</b>	<b>4530 North 25<sup>th</sup> Street, Terre Haute, Indiana 47805</b>
<b>County:</b>	<b>Vigo</b>
<b>SIC Code:</b>	<b>3596 (NAICS 333997)</b>
<b>Operation Permit No.:</b>	<b>167-11852-00122</b>
<b>Permit Reviewer:</b>	<b>Scott Sines</b>

Vigo County Air Pollution Control (VCAPC) has reviewed an application from Emery Winslow Scale relating to the construction and operation of an Industrial Scale Manufacturing operation.

**Permitted Emission Units and Pollution Control Equipment**

The source does not have any currently-permitted emission units and pollution control devices.

**Unpermitted Emission Units and Pollution Control Equipment**

The source consists of the following unpermitted emission units:

- (a) One (1) paint room utilizing an airless air assist spray gun, constructed in 1956, with a maximum capacity of 2.5 gallons of paint per hour, using dry filters as control, and exhausting to three (3) 24" diameter stacks.
- (b) One (1) Powrmatic Model TE-41 natural gas-fired furnace with a heat input of 2.2 MMBtu/hr.
- (c) Five (5) Solartronics natural gas-fired radiant heat tubes, each with a heat input of 0.125 MMBtu/hr.
- (d) Eight (8) Solartronics natural gas-fired heaters, each with a heat input of 85 Btu/hr.
- (e) Seven (7) metal inert gas (MIG) welders.
- (f) Four (4) tungsten inert gas (TIG) welders.
- (g) One (1) MAAP gas welder.

**Existing Approvals**

The source has not been operating under any previous approvals.

**Enforcement Issue**

- (a) VCAPC is aware that equipment has been constructed and/or operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) VCAPC is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

**Stack Summary**

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
Paint Room	Exhaust fans (3)	8.5	2 ft each	7615 per fan	65

**Recommendation**

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

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 January 25, 2000, with additional information received on May 28, 2004.

**Emission Calculations**

See Appendix A of this document for detailed emission calculations (pages 1 through 5)

**Potential to Emit of the Source Before Controls**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential to Emit (tons/yr)
PM	25.03
PM-10	.58
SO <sub>2</sub>	0.0
VOC	54.50
CO	1.0
NO <sub>x</sub>	1.2

HAPs	Potential to Emit (tons/yr)
Toluene	9.47
Total	9.47

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM and VOC are less than 100 tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of PM and VOC

are greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.
- (c) **Fugitive Emissions**  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### County Attainment Status

The source is located in Vigo County.

Pollutant	Status
PM-2.5	attainment
PM-10	attainment
SO <sub>2</sub>	maintenance attainment
NO <sub>2</sub>	attainment
1-hr Ozone	attainment
8-hr Ozone	basic nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Vigo County has been designated as basic nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for emission offset.
- (b) Vigo County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) Vigo County has been classified as attainment or unclassifiable for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) **Fugitive Emissions**  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	1.50
PM-10	0.03
SO <sub>2</sub>	0.00
VOC	54.50
CO	1.0
NO <sub>x</sub>	1.2
Single HAP	9.47

This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater, no attainment pollutant is emitted at a rate of 250 tons per year, and it is not in one of the 28 listed source categories.

### Part 70 Permit Determination

#### 326 IAC 2-7 (Part 70 Permit Program)

This source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This is the first air approval issued to this source.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The source is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart M (Surface Coating of Miscellaneous Metal Parts and Products) due to HAP levels below the major source level.

### State Rule Applicability – Entire Source

#### 326 IAC 2-6 (Emission Reporting)

This source is located in Vigo County and the potential to emit VOC is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 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 the 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. This source is not located in the small area within Vigo County subject to the more stringent 30% opacity limitation.

### **State Rule Applicability – Individual Facilities**

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

The operation of the industrial scale manufacturing paint room will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) for surface coating operations**

Pursuant to 326 IAC 6-3-2(d) particulate from the paint room shall be controlled by dry particulate filters and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

Welding operations consume less than six hundred twenty-five (625) pounds of rod or wire per day. Therefore 326 IAC 6-3-1(b)(9) does not apply.

**326 IAC 8-2-9 (Miscellaneous Metal Coating)**

The source's paint room was constructed in 1956. Therefore 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) does not apply to this source.

### **Conclusion**

The operation of this industrial scale manufacturing operation shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit 167-11852-00122.

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

**Company Name:** Emery Winslow Scale  
**Address City IN Zip:** 4530 North 25th Street, Terre Haute, Indiana 47805  
**Permit Number:** MSOP 167-11852-00122  
**Plt ID:** 167-00122  
**Reviewer:** Scott Sines  
**Date:** 5/28/2004

Heat Input Capacity MMBtu/hr Potential Throughput MMBtu/yr  
 Powermatic Model TE-41 furnace, five (5) Solartronics Radiant Heat Tubes, eight (8) Solartronics KS-2 heaters  
 23.8 24.6

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.0	0.1	0.0	1.2	0.1	1.0

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu  
 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 (SUPPLEMENT D 3/98)  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

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

**Company Name: Emery Winslow Scale**  
**Address City IN Zip: 4530 North 25th Street, Terre Haute, Indiana 47805**  
**Permit Number: MSOP 167-11852-00122**  
**Pit ID: 167-00122**  
**Reviewer: Scott Sines**  
**Date: 5/28/2004**

		HAPs - Organics			
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.588E-05	1.479E-05	9.241E-04	2.218E-02	4.189E-05

		HAPs - Metals			
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	6.161E-06	1.355E-05	1.725E-05	4.682E-06	2.588E-05

Methodology is the same as page 1.

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  
VOC and Particulate  
From Surface Coating Operations

Company Name: Emery Winslow Scale  
Address City IN Zip: 4530 North 25th Street, Terre Haute, Indiana 47805  
Permit Number: MSOP 167-11852-00122  
Pit ID: 167-00122  
Reviewer: Scott Sines  
Date: 6/7/2004

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
5163EB	9.0	53.73%	0.0%	53.7%	0.0%	33.55%	2,500,000	1,000	4.81	4.81	12.04	288.85	52.72	27.24	14.35	40%
4449PA	9.8	45.02%	0.0%	45.0%	0.0%	34.33%	2,500,000	1,000	4.39	4.39	10.97	263.37	48.06	35.22	12.79	40%
5730E	8.2	60.90%	0.0%	60.9%	0.0%	31.70%	2,500,000	1,000	4.96	4.96	12.41	297.80	54.35	20.94	15.66	40%
5163EB w/Toluene	8.6	61.53%	0.0%	61.5%	0.0%	26.84%	2,500,000	1,000	5.30	5.30	13.26	318.23	58.08	21.79	19.76	40%
4449PA w/Toluene	9.3	53.64%	0.0%	53.6%	0.0%	27.82%	2,500,000	1,000	4.97	4.97	12.42	298.02	54.39	28.20	17.98	40%
5730E w/Toluene	8.0	68.02%	0.0%	68.0%	0.0%	25.19%	2,500,000	1,000	5.42	5.42	13.55	325.27	59.36	16.75	21.52	40%

**State Potential Emissions**      **Worst case coating 5730E w/Toluene**      **13.55**      **325.27**      **59.36**      **35.22**

**NOTE:** Toluene is used as a clean-up solvent for the airless air assist sprayer. As the sprayer is cleaned the solvent is sprayed directly into a 55-gallon drum for recovery. The drum is then sealed after each clean-up.

**NOTE:** AP-42, Table 4.2.2.11-1, lists a minimum transfer efficiency for this type of operation at 40%. Therefore the worst case transfer efficiency figure was used for these calculations.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Potential VOC Pounds per Hour = (Density (lb/gal) \* Weight % Organics)

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

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

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1-Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations  
HAP Emission Calculations

Company Name: Emery Winslow Scale  
 Address City IN Zip: 4530 North 25th Street, Terre Haute, Indiana 47805  
 Permit Number: MSOP 167-11825-00122  
 Pit ID: 167-00122  
 Permit Reviewer: Scott Sines  
 Date: 6/15/2004

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)
5163EB	9.2	2,500,000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4449PA	9.8	2,500,000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5730E	8.2	2,500,000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5163EB w/Tol	8.6	2,500,000	1.00	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	18.83	0.00	0.00	0.00	0.00	0.00
4449PA w/Tol	9.3	2,500,000	1.00	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	20.37	0.00	0.00	0.00	0.00	0.00
5730E w/Tol	8.6	2,500,000	1.00	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	17.52	0.00	0.00	0.00	0.00	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
				0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions **Worst case coating 4449PA w/Toluene** 0.00 20.37 0.00 0.00 0.00 0.00

NOTE: Toluene is used as a clean-up solvent for the airless air assist sprayer. As the sprayer is cleaned the solvent is sprayed directly into a 55-gallon drum for recovery. The drum is then sealed after each clean-up.

**METHODOLOGY**

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



# Indiana Department of Environmental Management Office of Air Quality

## Addendum to the Minor Source Operating Permit

<b>Source Name:</b>	<b>Emery Winslow Scale</b>
<b>Source Location:</b>	<b>4530 North 25<sup>th</sup> Street, Terre Haute, IN 47805</b>
<b>County:</b>	<b>Vigo</b>
<b>SIC Code:</b>	<b>3596</b>
<b>Operation Permit No.:</b>	<b>M167-11852-00122</b>
<b>Permit Reviewer:</b>	<b>Scott Sines</b>

On August 18, 2005, the Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC) had a notice published in the Terre Haute Tribune Star, Terre Haute Indiana, stating that Emery Winslow Scale had applied for a Minor Source Operating Permit to operate a stationary industrial scale manufacturing plant. The notice also stated that OAQ and VCAPC proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, VCAPC and IDEM-OAQ have decided to make the following changes:

1. Section C.10 "Actions Related to Noncompliance Demonstrated by a Stack Test" has been added before the "Record Keeping and Reporting Requirements" section. The items following C.10 have been re-numbered.

### **C.10 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (a) **When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.**
- (b) **A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.**
- (c) **IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.**

**The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.**

### **Record Keeping and Reporting Requirements**

#### **C.101 Malfunctions Report [326 IAC 1-6-2]**

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), VCAPC, or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more

than one (1) hour, said condition shall be reported to OAQ and VCAPC using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (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.142 General Record Keeping Requirements [326 IAC 2-6.1-5]**

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- (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 or VCAPC makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or VCAPC within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

**C.123 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]**

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- (a) Reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204  
  
and  
  
Vigo County Air Pollution Control  
103 South 3<sup>rd</sup> Street  
Terre Haute, Indiana 47807
- (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, and VCAPC on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

2. Sub-section D.1.3(b) "To document compliance with Condition D.1.1, the Permittee shall maintain records of any additional inspections prescribed by the Preventative Maintenance Plan" has been added.

#### D.1.3 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1 the Permittee shall maintain a record of inspections and any actions taken as required by Condition D.1.1.
  - (b) To document compliance with Condition D.1.1, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.**
  - ~~(b)~~(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
3. An error was made on the TSD, Appendix A, pages 3-4 which carried through the permitting process. The corrected calculations are on the following pages. The calculations included with the TSD during the public notice were not changed as the calculations are part of the TSD which is a historical document. The public notice calculations incorrectly assumed an equal amount of each coating could be used in the worst case. The corrected calculations assume the worst case coating for each pollutant will be used alone. The error did not affect the rule applicabilities established in the TSD. No other changes occurred because of this error.

**Corrected Calculations**

Company Name: Emery Winslow Scale  
Address City IN Zip: 4530 North 26th Street, Terre Haute, Indiana 47805  
Permit Number: MSOP 167-11852-00122

Pit ID: 167-00122  
Reviewer: Scott Sines  
Date: 6/7/2004

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
5163EB	9.0	53.73%	0.0%	53.7%	0.0%	33.55%	2.50000	1.000	4.81	4.81	12.04	288.85	52.72	27.24	14.35	40%
4449FA	9.8	45.02%	0.0%	45.0%	0.0%	34.35%	2.50000	1.000	4.39	4.39	10.97	263.37	48.06	35.22	12.79	40%
5730E	8.2	60.80%	0.0%	60.9%	0.0%	31.70%	2.50000	1.000	4.96	4.96	12.41	297.80	54.35	20.94	15.66	40%
5163EB w/Toluene	8.6	61.53%	0.0%	61.5%	0.0%	26.84%	2.50000	1.000	5.30	5.30	13.26	318.23	58.08	21.79	19.76	40%
4449FA w/Toluene	9.3	53.64%	0.0%	53.6%	0.0%	27.62%	2.50000	1.000	4.97	4.97	12.42	298.02	54.39	28.20	17.98	40%
5730E w/Toluene	8.0	68.02%	0.0%	68.0%	0.0%	25.19%	2.50000	1.000	5.42	5.42	13.55	325.27	59.36	16.75	21.52	40%

**State Potential Emissions**

Worst case coating 5730E w/Toluene  
NOTE: Toluene is used as a clean-up solvent for the airless air assist sprayer. As the sprayer is cleaned the solvent is sprayed directly into a 55-gallon drum for recovery. The drum is then sealed after each clean-up.  
NOTE: AP-42, Table 4.2.2.11-1 lists a minimum transfer efficiency for this type of operation at 40%. Therefore the worst case transfer efficiency figure was used for these calculations.

13.55      325.27      59.36      35.22

**Public Notice Calculations**

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

Company Name: Emery Winslow Scale  
Address City IN Zip: 4530 North 25th Street, Terre Haute, Indiana 47805  
Permit Number: MSOP 167-11852-00122

Pit ID: 167-00122  
Reviewer: Scott Sines  
Date: 6/7/2004

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
5163EB	9.0	53.73%	0.0%	53.7%	0.0%	33.55%	2.50000	0.167	4.81	4.81	2.01	48.15	8.79	4.54	14.35	40%
4449FA	9.8	45.02%	0.0%	45.0%	0.0%	34.35%	2.50000	0.167	4.39	4.39	1.83	43.90	8.01	5.87	12.79	40%
5730E	8.2	60.80%	0.0%	60.9%	0.0%	31.70%	2.50000	0.167	4.96	4.96	2.07	49.64	9.06	3.49	15.66	40%
5163EB w/Toluene	8.6	61.53%	0.0%	61.5%	0.0%	26.84%	2.50000	0.167	5.30	5.30	2.21	53.05	9.68	3.63	19.76	40%
4449FA w/Toluene	9.3	53.64%	0.0%	53.6%	0.0%	27.62%	2.50000	0.167	4.97	4.97	2.07	49.68	9.07	4.70	17.98	40%
5730E w/Toluene	8.0	68.02%	0.0%	68.0%	0.0%	25.19%	2.50000	0.167	5.42	5.42	2.26	54.22	9.90	2.79	21.52	40%

**State Potential Emissions**

Worst case coating to all solvents  
NOTE: Toluene is used as a clean-up solvent for the airless air assist sprayer. As the sprayer is cleaned the solvent is sprayed directly into a 55-gallon drum for recovery. The drum is then sealed after each clean-up.  
METHODODOLOGY

12.44      298.65      54.50      25.03

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

