

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) RENEWAL
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
AND
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

**Major Tool & Machine, Inc.
1458 East 19th Street
Indianapolis, Indiana 46218**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-14822-00275	
Issued by: Original Signed by John B. Chavez John B. Chavez, Administrator Office of Environmental Services	Issuance Date: 03-29-2004 Expiration Date: 03-28-2009

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Certification Form
Emergency Occurrence Form
FESOP Quarterly Report
Quarterly Deviation and Compliance Monitoring Report Form

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 City of Indianapolis, Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary industrial and commercial machinery manufacturing plant and produces industrial and commercial machinery.

Authorized Individual:	Vice President, Human Resources
Source Address:	1458 East 19 th Street, Indianapolis, Indiana, 46218
Mailing Address:	1458 East 19 th Street, Indianapolis, Indiana, 46218
General Source Phone:	(317) 636-6433
SIC Code:	3599
County Location:	Marion
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) paint spray booth, identified as PB-1, installed in June 1992, equipped with two (2) air atomization paint spray guns (with only one (1) paint spray gun can be used at any one time), air filters for overspray control, one(1) natural gas fired make up heater rated at 3.88 MMBtu/hr, and one (1) natural gas fired drying oven rated at 2.5 MMBtu/hr. The spray booth has a maximum coating rate of 0.5 units per hour with rated material usage of 3 gallons per unit and exhausts through two (2) exhaust stacks, identified as 001 and 002 with a total exhaust rate of 40,000 acfm.
- (b) One (1) single chamber blast machine, identified as SB-1, installed in August 1992, utilizing Aluminum Oxide as the blasting media, using one (1) single nozzle at 3/8th inch diameter and nozzle pressure of 100 psig. The blast machine uses one (1) baghouse with one (1) Vari-Pak cartridge filter for particulate matter control. The exhaust gas from the blast machine is vented back into building at a rate of 23,000 acfm.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Spray can touch up painting of production items
- (b) Plant #1 (West) natural gas fired combustion furnaces and heaters at a total heat input of 2.91 MMBtu per hour,

- (c) Plant #2 (East) natural gas fired combustion furnaces and heaters at a total heat input of 4.62 MMBtu per hour,
- (d) Three (3) natural gas fired space heaters at a total heat input of 1.93 MMBtu per hour,
- (e) One (1) natural gas heat treating furnace rated at 0.33 MMBtu per hour,
- (f) Equipment powered by internal combustion engines of capacity less than 0.5 MMBtu per hour,
- (g) Replacement filters for air handling units,
- (h) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids,
- (i) Machining where an aqueous cutting coolant continuously floods the machining interface,
- (j) Brazing equipment, cutting torches, soldering equipment and welding equipment not resulting in HAP's emissions,
- (k) Application of oils, greases, lubricants and other nonvolatiles applied as temporary protective coatings,
- (l) Cleaners and solvent(s) usage not exceeding 145 gallons per 12 months,
- (m) Closed loop heating and cooling systems,
- (n) Structural steel and bridge fabrication activities of less than 80 tons/yr welding consumables and cutting less than 200,00 linear feet of one (1) inch plate or equivalent,
- (o) Quenching operations used with heat treating processes,
- (p) Process vessel degassing and cleaning to prepare for internal repairs,
- (q) Paved and unpaved roads and parking lots with public access,
- (r) Gasoline generators not exceeding 110 Horsepower,
- (s) A natural gas fired paint-curing oven rated at 2.5 MMBtu/hr,
- (t) Plant #3 - two (2) natural gas fired boilers, each with a maximum heat input rate of 2.05 MMBTU per hour,
- (u) Plant #3 - one (1) natural gas fired Thermocycler heating unit rate at 0.4 MMBtu/hr used for comfort heating,
- (v) Emissions resulting from metal inspection operations considered to be an activity with emissions equal to or less than the threshold equaling 3 pounds per hour or 15 pounds per day for Volatile Organic Compounds (VOC),

- (w) Emissions resulting from the self-contained paint gun and line cleaning unit considered to be an activity with emissions equal to or less than the threshold equaling 3 pounds per hour or 15 pounds per day for VOC,
- (x) Emissions resulting from the application of protective metal coatings considered to be an activity with emissions equal to or less than the threshold equaling 3 pounds per hour or 15 pounds per day for VOC,
- (y) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs,
- (z) Heat exchanger cleaning and repair,
- (aa) Purging gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process,
- (bb) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment, and
- (cc) Blowout for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the OES to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][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, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and OES 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. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, and OES 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ, and the OES may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the OES on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and the

OES may require to determine the compliance status of the source.

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(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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 Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and the OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and the OES. IDEM, OAQ, and the OES, 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 or potential to emit. The PMP does not require the certification by the "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.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and the OES, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

City of Indianapolis OES
Telephone No.: 317/327-2234
Facsimile No.: 317/327-2274

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ and the OES, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ and the OES, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or the OES determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ or the OES, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or the OES, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or the OES, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and the OES and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) 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 the OES on or before the date it is due.

(2) If IDEM, OAQ and the OES upon receiving a timely and complete 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.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and the OES 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 in writing by IDEM, OAQ and the OES, any additional information identified as needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

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

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, the OES or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

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

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 OES, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize

any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2(Prevention of Significant Deterioration (PSD)) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) 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(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

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 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

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

C.9 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, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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 the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana 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 [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

- (a) 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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

- (b) The Permittee shall notify IDEM, OAQ and the OES of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and the OES, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and the OES, if the source submits to IDEM, OAQ, and the OES 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.11 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed 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.

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

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in 40 CFR 68 is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports
[326 IAC 2-8-4] [326 IAC 2-8-5]

- (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 the OES, 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 is 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 time frame 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 and the Permittee documents such response in accordance with subsection (e) below, 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 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ 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 constitute a deviation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B - Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) 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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, and OES within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility 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 retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement 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 the OES on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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 the OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or the OES within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

One (1) paint spray booth, identified as PB-1, installed in 1992, equipped with two (2) air atomization paint spray guns, where only one (1) paint spray gun can be used at any one time, air filters for overspray control, one (1) natural gas fired make up heater rated at 3.88 MMBtu/hr, and one (1) natural gas fired drying oven rated at 2.5 MMBtu/hr. The spray booth has a maximum coating rate of 0.5 units per hour with rated material usage of 3 gallons per unit and exhausts through two (2) exhaust stacks, identified as 001 and 002 exhaust with a total exhaust rate with a total of 40,000 acfm.

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

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

D.1.1 Volatile Organic Compound [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied at PB-1, as a daily volume weighted average, to miscellaneous metal parts, including maintenance spray painting of production equipment, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried or forced warm air dried at temperatures up to ninety (90) Celsius (one hundred and ninety four (194) degrees Fahrenheit) for the coating application system.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such manner that evaporation is minimized.

- (b) Any change or modification which may increase actual VOC emissions to greater than fifteen (15) pounds per day, before add-on controls, when coating metal parts with protective metal coatings, as an insignificant activity, shall require OAQ's prior approval before such change can take place.

D.1.2 Hazardous Air Pollutants [326 IAC 2-8]

The hazardous air pollutant emissions shall be limited as follows:

- (a) The total usage of the worst case single hazardous air pollutant (HAP) at PB-1 shall not exceed nine (9) tons per twelve (12) months period, with compliance determined at the end of each month. This nine (9) tons per year limit with the one (1) ton per year maximum potential to emit of any single HAP from the insignificant activities limits the potential to emit of the entire source to less than ten (10) tons per twelve (12) consecutive month period of any single HAP.
- (b) The total usage of the combination of HAPs at PB-1 shall not exceed twenty-four (24) per twelve (12) months period, with compliance determined at the end of each month. This twenty-four (24) tons per twelve (12) consecutive month period limit with the one (1) ton per year maximum potential to emit of total combined HAP from the insignificant activities limits the potential to emit of the entire source to less than 25 tons per 12 consecutive month period of total combined HAP.

Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to F097-6238-00275, issued on June 4, 1997, and 40 CFR 52 Subpart P, the PM from the paint spray booth PB-1 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

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

Pursuant to 326 IAC 6-3-2(d), particulate from PB-1 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

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

Compliance Determination Requirements

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

Compliance with the VOC and HAP content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, and the OES, reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Volatile Organic Compounds (VOC)[326 IAC 8-1-2]

Compliance with the VOC content limit in condition D.1.1(a) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [3(C \times U) / 3 U]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and
U is the usage rate of the coating in gallons per day.

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

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and emission limits established in Condition D.1.1.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent less water used on daily basis.
 - (a) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (b) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The total VOC usage for each day when coating metal parts with protective metal coatings; and
 - (4) Daily weighted average VOC content per gallon of coating less water.
- (b) To document compliance with Condition D.1.2, the permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total single and combined HAPs usage for each month;
 - (3) The weight of worst-case single HAP and combination HAPs emitted for each compliance period.
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter period being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

One (1) single chamber blast machine, identified as SB-1, installed in August 1992, utilizing Aluminum Oxide as the blasting media, using one (1) single nozzle at 3/8th inch diameter and nozzle pressure of 100 psig. The blast machine uses one (1) baghouse with one (1) Vari-Pak cartridge filter for particulate matter control. The exhaust gas from the blast machine is vented back into building at a rate of 23,000 acfm.

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

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

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the single chamber blast machine shall not exceed 2.1 pounds per hour when operating at a process weight rate of 0.4 tons per hour. The pounds per hour limitation was calculated using the following equation:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

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

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

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

D.2.3 Particulate Control

In order to comply with condition D.2.1, the baghouse using cartridge filter for particulate control shall be in operation and control emissions from the single chamber blast machine (SB-1) at all times that the single chamber blast machine is in operation.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

Two (2) natural gas fired boilers, each with a maximum heat input rate of 2.05 MMBTU per hour.

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

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

D.3.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from each of the two (2) boilers, based on a total heat input rate of 4.1 MMBtu per hour, shall not exceed six tenths (0.6) pounds per MMBtu heat input.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Major Tool & Machine, Incorporated
Source Address: 1458 East 19th Street, Indianapolis, Indiana 46218
Mailing Address: 1458 East 19th Street, Indianapolis, Indiana 46218
FESOP No.: F-097-14822-00275

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
DATA COMPLIANCE
2700 South Belmont Avenue
Indianapolis, Indiana 46221
Phone:317-327-2234
Fax:317-327-2274**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Major Tool & Machine, Incorporated
Source Address: 1458 East 19th Street, Indianapolis, Indiana 46218
Mailing Address: 1458 East 19th Street, Indianapolis, Indiana 46218
FESOP No.: F097-14822-00275

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
☐ The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
☐ The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 CITY OF INDIANAPOLIS
 OFFICE OF ENVIRONMENTAL SERVICES
 DATA COMPLIANCE**

FESOP Quarterly Report

Source Name: Major Tool & Machine, Incorporated
 Source Address: 1458 East 19th Street, Indianapolis, Indiana 46218
 Mailing Address: 1458 East 19th Street, Indianapolis, Indiana 46218
 FESOP No.: F097-14822-00275
 Facility: Paint Spray Booth PB-1 and the insignificant activities
 Parameter: Single HAP and Total HAPs
 Limit: (a) The total usage of the worst case single hazardous air pollutant (HAP) at PB-1 shall not exceed nine (9) tons per twelve (12) months period, with compliance determined at the end of each month. This nine (9) tons per year limit with the one (1) ton per year maximum potential to emit of any single HAP from the insignificant activities limits the potential to emit of the entire source to less than ten (10) tons per twelve (12) consecutive month period of any single HAP.
 (b) The total usage of the combination of HAPs at PB-1 shall not exceed twenty-four (24) per twelve (12) months period, with compliance determined at the end of each month. This twenty-four (24) tons per twelve (12) consecutive month period limit with the one (1) ton per year maximum potential to emit of total combined HAP from the insignificant activities limits the potential to emit of the entire source to less than 25 tons per 12 consecutive month period of total combined HAP.

QUARTER: _____ YEAR: _____

Month	This month		Previous 11 months		12 Month Total	
	Single HAP	Total HAP	Single HAP	Total HAP	Single HAP	Total HAP
Month 1						
Month 2						
Month 3						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 CITY OF INDIANAPOLIS
 OFFICE OF ENVIRONMENTAL SERVICES
 DATA COMPLIANCE**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Major Tool & Machine, Incorporated
 Source Address: 1458 East 19th Street, Indianapolis, Indiana 46218
 Mailing Address: 1458 East 19th Street, Indianapolis, Indiana 46218
 FESOP No.: 097-14822-00275

Months: _____ **to** _____ **Year:** _____

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input checked="" type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

**Addendum to the
Technical Support Document for a Federally Enforceable State Operating
Permit (FESOP) Renewal**

Source Name: Major Tool & Machine, Inc.
Source Location: 1458 East 19th Street, Indianapolis, Indiana 46218
County: Marion
SIC Code: 3599
Operation Permit No.: F 097-14822-00275
Permit Reviewer: Femi Ogunsola/EVP

On November 1, 2003, the Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) had a notice published in The Indianapolis Star in Indianapolis, Indiana stating that Major Tools and Machine, Inc. (MTM) had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a steel fabricating, machining and welding plant. The notice also stated that OAQ and OES proposed to issue a FESOP renewal for this operation and provided information on how the public could review the proposed FESOP renewal 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 FESOP renewal should be issued as proposed.

On November 26, 2003, Major Tool and Machine, Inc., submitted comments to OES on the proposed permit. A summary of the comments and responses is listed below with any changes made to the permit shown in bold and deleted permit language shown with a strikethrough (a line through it):

Comment #1

A.1 General Information [326 IAC 2-8-3]

The Authorized Individual should be changed from "CEO" to "Vice President, Human Resources"

Response #1

Condition A.1 - General Information of the permit has been revised to read as follows:

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary industrial and commercial machinery manufacturing plant and produces industrial and commercial machinery.

Authorized Individual:	CEO Vice President, Human Resources
Source Address:	1458 East 19 th Street, Indianapolis, Indiana, 46218
Mailing Address:	1458 East 19 th Street, Indianapolis, Indiana, 46218
General Source Phone:	(317) 636-6433
SIC Code:	3599
County Location:	Marion
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act

Comment #2

C.2 Overall Source Limit [326 IAC 2-8]

The emission potentials for all regulated pollutants (Appendix A) other than Hazardous Air Pollutants (HAP) are below the Title V Major Source and PSD thresholds and thus the following statement should be removed:

~~“(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration – PSD) not applicable.”~~

Response #2

IDEM and OES are aware that the uncontrolled potential to emit (PTE) of regulated pollutants from the source, other than Hazardous Air Pollutants, are below the Title V Major Source and PSD thresholds of less than one hundred (100) tons per twelve (12) consecutive month period. Nonetheless, as a FESOP source the requirements of 326 IAC 2-8 are still applicable to this source. This condition ensures that the source not only complies with this rule under its current operating configuration, but also under any approved future configuration that increases the source's potential to emit a regulated pollutant. 326 IAC 2-8-4(1) requires “Emission limitations and standards, including those operational requirements and limitations that limit the source's capacity to emit air pollutants such that it does not fall within any of the categories listed in 326 IAC 2-7-2 (a) and that assure compliance with all applicable requirements at the time of FESOP issuance”. Also, if (a) (1) was removed then (b) would also need to be removed. If there is no longer a condition limiting the PTE to below major thresholds other than HAPs, there is no specified limits other than that of the HAPs that cannot be exceeded when adding insignificant activities. In order to fulfill the requirements of 326 IAC 2-8-4(1) and allow for the addition of insignificant activities, this condition must remain in the permit.

Comment #3

D.1.2: Hazardous Air Pollutants [326 IAC 2-8]

Major Tool and Machine requests a nine (9) ton individual HAP limit and a twenty-four (24) ton combined HAP limit in order to allow for emissions from all insignificant activities. Reporting of combined HAPs under the existing permit has demonstrated that they are well below one (1) ton on a consecutive 12-month basis. Therefore, tracking of HAP emissions from insignificant activities at the source is unnecessary and unduly burdensome.

It is requested that Section D.1.2 (a) and Section D.1.2 (b) read as follows:

- (a) The total usage of the worst case single hazardous air pollutant (HAP) at PB-1 shall not exceed nine (9) tons per twelve (12) months period, with compliance determined at the end of each month. This will limit the potential to emit of a single HAP, including allowance for one (1) ton of insignificant activities HAP emissions, to less than ten (10) tons per 12 consecutive month period for the entire source.
- (b) The total usage of the combination of HAPs at PB-1 shall not exceed twenty-four (24) tons per twelve (12) months period, with compliance determined at the end of each month. Compliance with this condition shall limit potential to emit of combined HAPs, including allowance for one (1) ton of insignificant activities HAP emissions, to less than 25 tons per 12 consecutive month period for the entire source.

Response #3

The potential to emit of any single HAP and total combined HAP has been verified to be less than 1 ton per year. Therefore, sections D.1.2(a) and D.1.2(b) have been revised as follows:

- (a) The total usage of the worst case single hazardous air pollutant (HAP) at ~~this source including PB-1 and insignificant activities~~ shall be limited to less than ~~ten (10)~~ **nine (9)** tons per twelve (12) months period, with compliance determined at the end of each month. **This nine (9) tons per year limit with the one (1) ton per year maximum potential to emit of any single HAP from the insignificant activities limits the potential to emit of the entire source to less than ten (10) tons per twelve (12) consecutive month period of any single HAP.**
- (b) The total usage of the combination of HAPs at ~~this source including PB-1 and insignificant activities~~ shall be limited to ~~twenty-five (25)~~ **twenty-four (24)** tons per twelve (12) months period, with compliance determined at the end of each month. **This twenty-four (24) tons per twelve (12) consecutive month period limit with the one (1) ton per year maximum potential to emit of total combined HAP from the insignificant activities limits the potential to emit of the entire source to less than 25 tons per 12 consecutive month period of total combined HAP.**

Comment #4

D.1.9 Record Keeping Requirements

Please explain the necessity for requiring the following in order to demonstrate compliance with D.1.1:

D.1.9(a)(2)(b)

Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

D.1.9(a)(3)

The cleanup solvent usage for each day;

D.1.9 (a)(4)

The total VOC usage for each day; and

Please explain the necessity for requiring the following in order to demonstrate compliance with D.1.2:

D.1.9 (b)(2)(b)

Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

Response #4

Regarding the comment pertaining to Condition D.1.9(a)(2)(b), solvent usage records (in conjunction with coating usage records) are required since the corresponding emission limit at D.1.1 is reflective of an "as-applied" basis. Therefore, in order to demonstrate compliance on an "as-applied" basis, the Permittee is required to differentiate which solvents are used when applying a coating, versus solvents used for clean up purposes. The source must keep records of all solvent used for coatings and those used as cleaning solvents in order to show that each solvent or coating used is a compliant solvent or coating. Compliance with 326 IAC 8-2-9 should be determined at the end of each month using the volume weighted VOC content of the coatings and solvents as required in Section D.1.7.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied at PB-1, as a daily volume weighted average, to miscellaneous metal parts, including maintenance spray painting of production equipment, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried or forced warm air dried at temperatures up to ninety (90) Celsius (one hundred and ninety four (194) degrees Fahrenheit) for the coating application system.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such manner that evaporation is minimized.

Regarding D.1.9(a)(3), this is redundant and is removed from D.1.9. Regarding D.1.9 (a)(4), this condition is relevant only to D.1.1(b); therefore, D.1.9(a)(4) is revised to clarify this fact. Finally, regarding D.1.9(2)(b), this requirement is unnecessary for purposes of demonstrating compliance with D.1.2 and is removed from the permit. Therefore Condition D.1.9 is revised as follows:

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (54) below. Records maintained for (1) through (54) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and emission limits established in Condition D.1.1.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent less water used on daily basis.
 - (a) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (b) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) ~~The cleanup solvent usage for each day;~~
 - (43) The total VOC usage for each day **when coating metal parts with protective metal coatings;** and
 - (54) Daily weighted average VOC content per gallon of coating less water.
- (b) To document compliance with Condition D.1.2, the permittee shall maintain records in accordance with (1) through (43) below. Records maintained for (1) through (43) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The **amount and** HAP content of each coating material and solvent used.
 - (2) ~~The amount of coating material and solvent less water used on monthly basis.~~
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.~~
 - (32) The total single and combined HAPs usage for each month;
 - (43) The weight of worst-case single HAP and combination HAPs emitted for each compliance period.
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment #5

In the Technical Support Document under “Insignificant Activities”, the following insignificant activity is listed:

- (a) Spray can touch up painting of production items with maximum capacity of less than 5 gallons per day,

The original permit stated the following:

- (a) Spray can touch up painting of production items.

It is unclear how the 5 gallons per day came to be included. Based on the most recent 12-month actual usage information, it has been determined that less than 0.04 gallon per day was used based on 260 days of annual operation.

Response #5

The phrase “... with maximum capacity of less than 5 gallons per day” was added to the description to indicate that rule [326 IAC 6-3-2] does not apply, pursuant to 326 IAC 6-3-2 (d)(4). However, as an activity that applies aerosol coating products to repair minor damage and imperfections, the exemption of 326 IAC 6-3-1 (12) is instead applicable. As such, the description is revised as follows:

- (a) Spray can touch up painting of production items ~~with maximum capacity less than 5 gallons per day,~~

The Technical Support Document (TSD) reflects the version of the draft that was placed on public notice. Changes to the permit or technical support material that occur after the public notice ends are presented in this Addendum to the TSD. This ensures that permit related concerns are documented as part of the record regarding this permit decision. Therefore, there are no changes to the TSD due to this comment.

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

**Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP) Renewal**

Source Background and Description

Source Name: Major Tool & Machine, Incorporated
Source Location: 1458 East 19th Street, Indianapolis, Indiana 46218
County: Marion
SIC Code: 3599
Operation Permit No.: F097-14822-00275
Permit Reviewer: Femi Ogunsola/EVP

The Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) have reviewed a Federally Enforceable State Operating Permit (FESOP) renewal application from Major Tool & Machine, Incorporated relating to the operation of a steel fabricating, machining and welding source that manufactures predominantly gas turbine and power generator equipment. Major Tool & Machine, Incorporated was issued FESOP (F097-6238-00275) on June 4, 1997. This renewal approval includes the changes requested by the Permittee in their submittal to OES on June 28, 2002, as approval request number 097-16187. This approval further includes the changes requested by the Permittee in their submittal to OES on September 24, 1998, as approval request number 097-11745. These changes are listed as additional insignificant activities added to this source, as described herein.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) paint spray booth, identified as PB-1, installed in June 1992, equipped with two (2) air atomization paint spray guns (where only one (1) paint spray gun can be used at any one time), air filters for overspray control, one(1) natural gas fired make up heater rated at 3.88 MMBtu/hr, and one (1) natural gas fired drying oven rated at 2.5 MMBtu/hr. The spray booth has a maximum coating rate of 0.5 units per hour with rated material usage of 3 gallons per unit and exhausts through two (2) exhaust stacks, identified as 001 and 002 with a total exhaust rate of 40,000 acfm.
- (b) One (1) single chamber blast machine, identified as SB-1, installed in August 1992, utilizing Aluminum Oxide as the blasting media, using one (1) single nozzle at 3/8th inch diameter and nozzle pressure of 100 psig. The blast machine uses one (1) baghouse with one (1) Vari-Pak cartridge filter for particulate matter control. The exhaust gas from the blast machine is vented back into building at a rate of 23,000 acfm.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Spray can touch up painting of production items with maximum capacity less than 5 gallons per day,
- (b) Plant #1 (West) natural gas fired combustion furnaces and heaters at a total heat input of 2.91 MMBtu per hour,
- (c) Plant # 2 (East) natural gas fired combustion furnaces and heaters at a total heat input of 4.62 MMBtu per hour,
- (d) Three (3) natural gas fired space heaters at a total heat input of 1.93 MMBtu per hour,
- (e) One (1) natural gas heat treating furnace rated at 0.33 MMBtu per hour,
- (f) Equipment powered by internal combustion engines of capacity less than 0.5 MMBtu per hour,
- (g) Replacement filters for air handling units,
- (h) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids,
- (i) Machining where an aqueous cutting coolant continuously floods the machining interface,
- (j) Brazing equipment, cutting torches, soldering equipment and welding equipment not resulting in HAP's emissions,
- (k) Application of oils, greases, lubricants and other nonvolatiles applied as temporary protective coatings,
- (l) Cleaners and solvent(s) usage not exceeding 145 gallons per 12 months,
- (m) Closed loop heating and cooling systems,
- (n) Structural steel and bridge fabrication activities of less than 80 tons/yr welding consumables and cutting less than 200,00 linear feet of one (1) inch plate or equivalent,
- (o) Quenching operations used with heat treating processes,
- (p) Process vessel degassing and cleaning to prepare for internal repairs,
- (q) Paved and unpaved roads and parking lots with public access,
- (r) Gasoline generators not exceeding 110 Horsepower,
- (s) The following insignificant activities are added in this approval, to those identified in the original permit:
 - (1) A natural gas fired paint-curing oven rated at 2.5 MMBtu/hr.
 - (2) Emissions resulting from metal inspection operations considered to be an activity with emissions equal to or less than the threshold equaling 3 pounds per hour or 15 pounds per day for Volatile Organic Compounds (VOC).
 - (3) Emissions resulting from the self-contained paint gun and line cleaning unit

considered to be an activity with emissions equal to or less than the threshold equaling 3 pounds per hour or 15 pounds per day for Volatile Organic Compounds (VOC).

- (4) Emissions resulting from the application of protective metal coatings considered to be an activity with emissions equal to or less than the threshold equaling 3 pounds per hour or 15 pounds per day for VOC.
- (5) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (6) Heat exchanger cleaning and repair.
- (7) Purging gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (8) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (9) Blowout for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (10) Plant #3 - two (2) natural gas fired boilers, each with a maximum heat input rate of 2.05 MMBTU per hour.
- (11) Plant #3 - one (1) natural gas fired Thermocycler heating unit rate at 0.4 MMBtu/hr used for comfort heating.

Existing Approvals

- (a) FESOP F097-6238-00275 , issued on June 4, 1997.

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.

The following terms and conditions from previous approvals were not incorporated into this FESOP:

D.1.4. Particulate Matter (PM) Emissions

PM emissions shall be limited as follows:

- (a) Pursuant to 326 IAC 6-1-2, PM emissions from Emission Unit ID PB-1 shall not exceed 0.03 gr/dscf.
- (b) Particulate Matter (PM) Emissions from Emission Unit ID PB-1, SB-1 and all insignificant activities shall not exceed 99 tons per 365 day period rolled on a daily basis. Therefore, the requirements of 326 IAC 2-3 Emission Offset do not apply.

Reason not incorporated: This condition is obsolete. With respect to paragraph (a), this source

and its facilities are not specifically listed at 326 IAC 6-1-12, and the potential to emit (PTE) of PM for the source is less than 100 tpy, and actual PM emissions are less than 10 tpy. Therefore, the requirements of 326 IAC 6-1 do not apply. With respect to paragraph (b), on July 1, 1987, U.S. EPA revised the National Ambient Air Quality Standards (NAAQS) for particulate, replacing PM with the newly designated NAAQS for PM10. As such, PM is no longer considered in determining a county's attainment status, only PM-10 is considered. Since Marion County is in attainment for PM-10, the rules pursuant to 326 IAC 2-3 are no longer applicable to this source. However, 326 IAC 6-3 does apply.

D.2.1 Particulate Matter

- (a) Pursuant to 326 IAC 6-1-2 (Nonattainment Area PM Limitations), PM emissions from the shot blasting system shall not exceed 0.03 gr/dscf.
- (b) PM emissions from Emission Unit ID SB-1, PB-1 and all insignificant activities shall not exceed 99 tons per 365 day period rolled on a daily basis such that 326 IAC 2-3 (Emission Offset) does not apply.

Reason for not incorporated: As part of this renewal request, the Permittee has indicated that they have changed the SB-1 blast media from sand to aluminum oxide. With this change in blast media, the source has potential PM emissions of less than 100 tons per year and actual PM emissions of less than 10 tons per year. Therefore, pursuant to 326 IAC 6-1-1, the requirements of 326 IAC 6-1-2 do not apply but 326 IAC 6-3-2 still applies to this source. Paragraph (b) of this condition does not apply for the same reason provided in the explanation provided above on Condition D.1.4.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal 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 administratively complete FESOP Renewal application for the purposes of this review was received on September 4, 2001.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 6).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	less than 10
VOC	less than 100
CO	less than 10
NO _x	less than 10

HAP's	Potential To Emit (tons/year)
Xylene	greater than 10
Toluene	less than 10
Ethyl Benzene	less than 10
Methyl Ethyl Ketone	less than 10
Glycol Ethers	less than 10
TOTAL	greater than 25

- (a) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and the unrestricted potential emissions of combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) 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 emissions are not counted toward determination of PSD applicability.

Potential to Emit After Issuance

The source was issued a FESOP on June 4, 1997 and has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/facility	Potential to Emit (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs	
							Worst Case Single	Total
Paint Booth and Makeup Air & Drying Oven Fuel Combustion (PB-1)	1.96 ⁽¹⁾	1.96 ⁽¹⁾	0.00	40.34	0.00	0.00	<10(Xylene)	< 24.9
Shot blast machine (SB-1)	0.32 ⁽¹⁾	0.32 ⁽¹⁾	0.00	0.00	0.00	0.00	0.00	0.00
Natural Gas Combustion (7.38 MMBtu/Hr) (Insignificant Activities)	0.10	0.20	0.00	0.20	2.70	3.20	0.06 (Hexane)	0.06
Total Emissions	2.38	2.48	0.00	40.54	2.70	3.20	<10.00	<25.0

Note (1): Controlled PM and PM-10 at maximum capacity at 8760 hours per year and assuming PM = PM 10

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO ₂	maintenance
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	maintenance

Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as maintenance for ozone.

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) There are no National Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 61, and 326 IAC 20 and 40 CFR Part 63) applicable to this source.
- (c) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Such requirements apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:
 - (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
 - (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
 - (3) the unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to be classified as a Part 70 major source.

This source is a FESOP source and is not a major Part 70 source. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.

Part 70 Permit Determination

This source is not subject to 326 IAC 2-7 (Part 70 Permit Program) requirements because the potential to emit (PTE) of:

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

This status is based on the information provided by the source.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on October 1995. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-6 Emission Reporting

This source is subject to 326 IAC 2-6 (Emission Reporting), because the source has potential VOC emissions exceed 10 tons/yr and is located in Marion County, the source is required to submit an annual emissions statement by April 15 of each year. Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6 and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8).

326 IAC 2-8 (FESOP)

Based on the information provided in the source's FESOP application, the source wide unlimited potential emissions of single HAP (Xylene) and total HAPs are greater than 10 and 25 tons per year respectively. However, the source will be limited as follows:

- (a) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (b) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period

The above limits shall render the requirements of 326 IAC 2-7 not applicable.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of thirty percent (30%) 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.

326 IAC 6-1 (County Specific Particulate Matter Limitations)

Pursuant to 326 IAC 6-1-1 (Applicability), specifically listed sources or facilities, or sources or facilities not specifically listed but located in a listed county and having either a potential to emit (PTE) one hundred (100) tons per year (tpy) or more or actual emissions of ten (10) tpy or more of particulate matter (PM), are subject to the applicable limitation(s).

The source is located in Marion County which is a specifically listed county. The source and its facilities are not specifically listed at 326 IAC 6-1-12 and, therefore, these rules do not apply. The PTE of PM for the source is less than 100 tpy, and actual PM emissions are less than 10 tpy. Therefore, the requirements of 326 IAC 6-1 do not apply.

State Rule Applicability - Individual Facilities

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

This rule establishes limitations for sources of indirect heating, receiving permits to construct on or after September 21, 1983. The two (2) natural gas fired boilers for this source, each with a maximum heat input rate of 2.05 million Btu per hour (MMBtu/hr), are subject 326 IAC 6-2-4 because they were constructed at the same time, in 2002, after the September 21, 1983 rule applicability date.

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from each of the two (2) boilers, based on a total heat input rate of 4.1 MMBtu per hour, shall not exceed six tenths (0.6) pounds per MMBtu heat input, determined as the lesser of the value Pt computed with the following formula:

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{where: } Pt = \text{Pounds of particulate matter emitted per MMBtu heat input.}$$

$Q = \text{Total source maximum operating capacity rating in MMBtu per hour.}$
 $Q = 4.1 \text{ MMBtu/hr}$

$$Pt = \frac{1.09}{(4.01)^{0.26}} = 0.76 \text{ pound per MMBtu heat input;}$$

or six tenths (0.6) pounds per MMBtu heat input for Q less than 10 MMBtu per hour.

The particulate matter emission from each of the two (2) boilers is 0.03 pound per MMBtu heat input for natural gas firing based on emission calculations in Appendix A. Therefore, these boilers will comply with 326 IAC 6-2-4.

326 IAC 6-3-2 (Process Operations)

Pursuant to 40 CFR 52, Subpart P the particulate matter (PM) from the spray paint booth (PB-1) shall be limited by the following:

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

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

$P = \text{process weight rate in tons per hour}$

Pursuant to 326 IAC 6-3-2(d), particulate from the spray paint booth (PB-1) shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

Spray can touch up painting operation uses less than 5 gallons of coating per day. Therefore, pursuant to 326 IAC 6-3-2(d)(4), the spray can touch up painting operation is not subject to the requirements of 326 IAC 6-3-2.

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

The particulate from the shot blasting (SB-1) shall be limited by the following:

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

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

$$E = 4.10 (0.36)^{0.67} = 2.068 \text{ pounds per hour}$$

The baghouse for shot blasting process shall be in operation at all times the shot blast equipment (SB-1) is in operation, in order to comply with this limit. There will be no compliance monitoring condition for this facility since the after control emissions (0.07 lb/hr) are well below the allowable emission (2.068 lb/hr)

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

This rule requires all facilities with a potential to emit (PTE) at or greater than twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide (SO₂) to comply with the emission limitations and test compliance methods stated in the rule. The two (2) natural gas fired boilers, each with a maximum heat input rate of 2.05 MMBTU per hour, as insignificant activities, do not individually have a PTE of SO₂ at or above the rule emission rate thresholds; therefore, 326 IAC 7-1.1 is not applicable to these facilities.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint spray booth (PB-1) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried or forced warm air dried at temperatures up to ninety (90) Celsius (one hundred and ninety four (194) degrees Fahrenheit) for the coating application system.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

The source shall use daily volume weighted average compliance determination to continue demonstrating compliance with the VOC content limits for Miscellaneous Metal Coating. This volume weighted average shall be determined by the following equation:

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

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and
U is the usage rate of the coating in gallons per day.

Pursuant to 326 IAC 8-2-1(a)(3), the application of protective metal coatings which have actual emissions less than 3 pounds per hour or 15 pounds per day for VOC, is not subject to rule 326 IAC 8-2-9.

There are no other Article 8 rules that apply to this source.

Testing Requirements

While IDEM may require compliance testing at any specific time to determine if the source is in compliance with an applicable limit or standard, compliance testing is not required for this renewal. Compliance testing is not required since the coating material usage and related VOC and volatile organic HAP emissions continue to assume an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the coating operation, and the overspray is required to be controlled by dry filters.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, and OES, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

The surface coating booth (PB-1) has applicable compliance monitoring conditions as specified below:

- (a) The dry filters shall be in operation at all times the surface coating booth (PB-1) is in operation, in order to comply with this limit.
- (b) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface paint spray booth (PB-1) stacks (001 and 002) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting

contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the dry filters for the surface coating booth must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this steel fabricating, machining and welding source will be subject to the conditions of the attached proposed **(FESOP No.: F097-14822-00275)**.

Appendix A: Emission Calculations

Company Name: Major Tool and Machine, Incorporated
Address City IN Zip: 1458 East 19th Street, Indianapolis, Indiana 46218
Plt ID: F097-14822-00275
Reviewer: FO/EVP
Date: 07/30/2003

Uncontrolled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating Emissions	Shot Blasting Emissions	Natural Gas Combustion	TOTAL
PM	39.22	31.54	0.10	70.9
PM10	39.22	31.54	0.20	71.0
SO2	0.00	0.00	0.00	0.0
NOx	0.00	0.00	3.20	3.2
VOC	40.34	0.00	0.20	40.5
CO	0.00	0.00	2.70	2.7
total HAPs	35.05	0.00	0.10	35.2
worst case single HAP	22.31 (Xylene)	0.00	0.06 (Hexane)	22.3
Total emissions based on rated capacity at 8,760 hours/year.				
Controlled Potential Emissions (tons/year)				
Emissions Generating Activity				
Pollutant	Surface Coating Emissions	Shot Blasting Emissions	Natural Gas Combustion	TOTAL
PM	1.96	0.32	0.10	2.4
PM10	1.96	0.32	0.20	2.5
SO2	0.00	0.00	0.00	0.0
NOx	0.00	0.00	3.20	3.2
VOC	40.34	0.00	0.20	40.5
CO	0.00	0.00	2.70	2.7
total HAPs	<24.9	0.00	0.10	<25
worst case single HAP	<10.0 (Xylene)	0.00	0.06 (Hexane)	<10
Total emissions based on rated capacity at 8,760 hours/year, after control.				

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

**Company Name: Major Tool and Machine, Incorporated
Address City IN Zip: 1458 East 19th Street
Plt ID: F097-14822-00275
Reviewer: FO/EVP
Date: 07/30/2003**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non 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
A/C 420 Wash Primer + Activator	7.0	90.92%	86.2%	4.7%	89.1%	5.11%	3.00000	0.500	3.01	0.33	0.49	11.76	2.15	2.49	6.39	40%
Amerlock 400 Green F/S + Cure + Thinner	11.6	14.46%	0.0%	14.5%	0.0%	81.36%	3.00000	0.500	1.68	1.68	2.52	60.54	11.05	39.22	2.07	40%
White Gloss Type1 + Catalyst/Gloss	10.4	33.73%	0.0%	33.7%	0.0%	49.11%	3.00000	0.500	3.50	3.50	5.26	126.16	23.02	27.14	7.14	40%
Thermaline 4700 Aluminum	9.7	52.00%	0.0%	52.0%	0.0%	31.00%	3.00000	0.500	5.04	5.04	7.57	181.58	33.14	18.35	16.27	40%
Tough Shield Polyurethane Gloss Enamel	9.8	31.68%	0.0%	31.7%	0.0%	51.4%	3.00000	0.500	3.11	3.11	4.67	112.04	20.45	26.46	6.05	40%
Aqua Borne Ceramic INT/EXT LO Sheen Primer & Rust Scat Acrylic Gloss Enamel	10.1	53.00%	47.3%	5.7%	0.0%	35.70%	3.00000	0.500	0.58	0.58	0.87	20.87	3.81	18.71	1.62	40%
Rust Scat Acrylic Gloss Enamel	10.6	57.00%	38.1%	18.9%	0.0%	32.00%	3.00000	0.500	2.00	2.00	3.00	72.01	13.14	17.97	6.25	40%
Isopropanol	6.6	100.00%	0.0%	100.0%	0.0%	0.00%	0.50000	0.500	6.58	6.58	1.65	39.48	7.21	0.00		

State Potential Emissions

**Worst case coating (coating usages are mutually exclusive) + Surface Preparation Solvent
Controlled emission (Based on 95% control of particulate emissions for dry filters)**

**9.21 221.06 40.34 39.22
1.96**

METHODOLOGY

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

**Appendix A: Emission Calculations
HAP Emission Calculations**

**Company Name: Major Tool and Machine, Incorporated
Address City IN Zip: 1458 East 19th Street
Plt ID: F097-14822-00275
Permit Reviewer: FO/EVP
Date: 07/30/2003**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethyl Benzene	Weight % Methyl Ethyl Ketone	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Combined HAPs (ton/yr)
A/C 420 Wash Primer + Activator	6.95	3.000000	0.50	1.96%	0.00%	0.00%	0.00%	0.00%	0.89	0.00	0.00	0.00	0.00	0.89
Amerlock 400 Green F/S + Cure + Thinner	11.62	3.000000	0.50	8.35%	0.03%	2.00%	0.00%	0.00%	6.37	0.02	1.53	0.00	0.00	7.92
White Gloss Type1 + Catalyst/Gloss	10.4	3.000000	0.50	0.00%	0.00%	0.00%	10.51%	8.69%	0.00	0.00	0.00	7.18	5.94	13.12
Thermaline 4700 Aluminum	9.7	3.000000	0.50	35.00%	10.00%	10.00%	0.00%	0.00%	22.31	6.37	6.37	0.00	0.00	35.05
Tough Shield Polyurethane Gloss Enamel	9.8	3.000000	0.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Aqua Borne Ceramic INT/EXT LO Sheen Primer &	10.1	3.000000	0.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Rust Scat Acrylic Gloss Enamel	10.6	3.000000	0.50	0.00%	0.00%	0.00%	0.00%	3.00%	0.00	0.00	0.00	0.00	2.09	2.09

Worst Case Coating (Coating Usages are mutually exclusive)

22.31 6.37 6.37 7.18 5.94 35.05

METHODOLOGY

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

Appendix A: Emission Calculations

Abrasive Blasting - Confined

Company Name: Major Tool and Machine, Inc.
 Address City IN Zip: 1458 East 19th Street
 Plt ID: F-097-14822-00275
 Reviewer: FO/EVP
 Date: 7/30/2003

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

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

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)

FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =

D = Density of abrasive (lb/ft3) From Table 2 =

D1 = Density of sand (lb/ft3) =

ID = Actual nozzle internal diameter (in) =

ID1 = Nozzle internal diameter (in) from Table 3 =

720
160
160
0.375
0.375

Flow Rate (FR) (lb/hr) = 720.000 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =

FR = Flow Rate (lb/hr) =

w = fraction of time of wet blasting =

N = number of nozzles =

0.010
720.000
0%
1

Uncontrolled Emissions =	7.20 lb/hr
	31.54 ton/yr
Controlled Emissions =	0.32 ton/yr

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs

Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)² x (D/D1)

E = EF x FR x (1-w/200) x N

w should be entered in as a whole number (if w is 50%, enter 50)

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

**Company Name: Major Tool and Machine, Incorporated
Address City IN Zip: 1458 East 19th Street, Indianapolis, Indiana 46218
Plt ID: F-097-14822-00275
Reviewer: FO/EVP
Date: 07/30/2003**

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

7.4

64.6

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	0.1	0.2	0.0	3.2	0.2	2.7

*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 6 for HAPs emissions calculations.

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

**Company Name: Major Tool and Machine, Incorporated
 Address City IN Zip: 1458 East 19th Street, Indianapolis, Indiana 46218
 Pit ID: F-097-14822-00275
 Reviewer: Femi Ogunsola/EVP
 Date: 6/18/2003**

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	6.788E-05	3.879E-05	2.424E-03	5.818E-02	1.099E-04

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	1.616E-05	3.556E-05	4.525E-05	1.228E-05	6.788E-05

Methodology is the same as page 5.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**MAJOR TOOL AND MACHINE, INC.
Insignificant Emissions Activities
POTENTIAL VOC and HAP Emissions**

EMISSIONS RESULTING FROM SPRAY TOUCH UP OF PRODUCTION ITEMS

Product	Density (lb/gal)	VOC (lb/gal)	Annual Usage (# of Cans)	Worst Case Usage (# of Cans)	Ounces per Can	Worst Case Annual Usage (gal)	VOC Emission (lbs/day)	Worst Case VOC emissions (ton/yr)	HAP Emissions Combined (Wt %)	Potential Combined HAP Emissions (tons/yr)
Flat Black	5.94	3.40	12	24	10	1.88	1.75E-02	3.19E-03	16.0%	8.91E-04
Krylon 1311	6.10	4.90	66	132	11	11.34	1.52E-01	2.78E-02	50.0%	1.73E-02
Contact Cleaner	5.56	5.56	36	72	12	6.75	1.03E-01	1.88E-02	3.0%	5.63E-04
<i>Emissions - lb/day</i>							2.73E-01			1.88E-02
<i>Subtotal Annual Emissions - TPY</i>								4.97E-02		

EMISSIONS RESULTING FROM METAL INSPECTION

Material	Density (lb/gal)	VOC (lb/gal)	Actual Daily Usage (gal/day)	Worst Case Daily Usage (gal/day)	Worst Case Annual Usage (gal)	Worst Case VOC Emissions (lb/day)	Worst Case VOC emissions (ton/yr)	HAP Emissions Combined (Wt %)	Potential Combined HAP Emissions (tons/yr)
DP-51 penetrant	7.24	8.34E-06	0.256	0.512	186.88	4.27E-06	7.80E-07	0.0%	0.00E+00
D-100 developer	7.53	6.13E-03	0.48	0.96	350.4	5.88E-03	1.07E-03	0.0%	0.00E+00
HM-406 penetrant	8.10	0.00E+00	0.032	0.064	23.36	0.00E+00	0.00E+00	0.0%	0.00E+00
DR-60 cleaner	6.43	6.26E-03	0.096	0.192	70.08	1.20E-03	2.19E-04	0.0%	0.00E+00
ZL-67 penetrant	8.26	7.43E-01	0.19	0.38	138.7	2.82E-01	5.15E-02	0.0%	0.00E+00
<i>Emissions - lb/day</i>						2.89E-01			0.00E+00
<i>Subtotal Annual Emissions - TPY</i>							5.28E-02		

EMISSIONS RESULTING FROM SELF CONTAINED SPRAY GUN AND LINE CLEANER

Product	Density (lb/gal)	VOC (lb/gal)	Annual Usage (gal)	Worst Case Annual Usage (gal)	Worst Case VOC Emission (Lbs/day)	Worst Case VOC emissions (ton/yr)	HAP Emissions Combined (%)	Potential Combined HAP Emissions (tons/yr)
Lacquer Thinner	6.70	6.70	110	220	4.04E+00	7.37E-01	75.0%	5.53E-01
<i>Emissions - lb/day</i>					4.04E+00			5.53E-01
<i>Total Annual Emissions - TPY</i>						7.37E-01		

EMISSIONS FROM PROTECTIVE METAL COATING APPLICATION

Product	Density (lb/gal)	VOC (lb/gal)	Annual Usage (gal)	Worst Case Annual Usage (gal)	Worst Case VOC Emission (Lbs/day)	Worst Case VOC emissions (ton/yr)	HAP Emissions Combined (Wt %)	Potential Combined HAP Emissions (tons/yr)
WOCO Penetrating Oil 40	6.70	6.03	55	110	1.82E+00	3.32E-01	5%	1.84E-02
<i>Emissions - lb/day</i>					1.82E+00			1.84E-02
<i>Subtotal Annual Emissions - TPY</i>						3.32E-01		

EMISSIONS RESULTING FROM CLEANER AND SOLVENT USAGE

Product	Density (lb/gal)	VOC (lb/gal)	Annual Usage (gal)	Worst Case Annual Usage (gal)	Worst Case VOC Emission (Lbs/day)	Worst Case VOC emissions (ton/yr)	HAP Emissions Combined (Wt %)	Potential Combined HAP Emissions (tons/yr)
Isopropanol	6.60	6.37	85	170	2.97E+00	5.41E-01	0.0%	0.00E+00
Acetone	6.60	6.31	Exempt				0.0%	
<i>Emissions - lb/day</i>					2.97E+00			0.00E+00
<i>Subtotal Annual Emissions - TPY</i>						5.41E-01		

EMISSIONS RESULTING FROM DEGASSING AND CLEANING TO PREPARE FOR INTERNAL REPAIR

Product	Density (lb/gal)	VOC (lb/gal)	Annual Usage (gal)	Worst Case Annual Usage (gal)	Worst Case VOC Emission (Lbs/day)	Worst Case VOC emissions (ton/yr)	HAP Emissions Combined (Wt %)	Potential Combined HAP Emissions (tons/yr)
Degassing (inert gases released)					0.00E+00	0.00E+00	0.0%	0.00E+00
Isopropanol	6.60	6.37	25	50	8.73E-01	1.59E-01	0.0%	0.00E+00
Acetone	6.60	6.31	Exempt				0.0%	
<i>Emissions - lb/day</i>					8.73E-01			0.00E+00
<i>Subtotal Annual Emissions - TPY</i>						1.59E-01		

TOTAL POTENTIAL VOC EMISSIONS - TPY 1.87

TOTAL COMBINED HAP EMISSIONS - TPY 0.59

MAJOR TOOL AND MACHINE, INC.
Insignificant Emissions Activities
POTENTIAL VOC and HAP Emissions

EMISSIONS RESULTING FROM SPRAY TOUCH UP OF PRODUCTION ITEMS

Product	Density (lb/gal)	VOC (lb/gal)	Annual Usage (# of Cans)	Worst Case Usage (# of Cans)	Ounces per Can	Worst Case Annual Usage (gal)	VOC Emission (lbs/day)	Worst Case VOC emissions (ton/yr)	HAP Emissions Combined (Wt %)	Potential Combined HAP Emissions (tons/yr)
Flat Black	5.94	3.40	12	24	10	1.88	1.75E-02	3.19E-03	16.0%	8.91E-04
Krylon 1311	6.10	4.90	66	132	11	11.34	1.52E-01	2.78E-02	50.0%	1.73E-02
Contact Cleaner	5.56	5.56	36	72	12	6.75	1.03E-01	1.88E-02	3.0%	5.63E-04
<i>Emissions - lb/day</i>							2.73E-01			1.88E-02
<i>Subtotal Annual Emissions - TPY</i>								4.97E-02		

EMISSIONS RESULTING FROM METAL INSPECTION

Material	Density (lb/gal)	VOC (lb/gal)	Actual Daily Usage (gal/day)	Worst Case Daily Usage (gal/day)	Worst Case Annual Usage (gal)	Worst Case VOC Emissions (lb/day)	Worst Case VOC emissions (ton/yr)	HAP Emissions Combined (Wt %)	Potential Combined HAP Emissions (tons/yr)
DP-51 penetrant	7.24	8.34E-06	0.256	0.512	186.88	4.27E-06	7.80E-07	0.0%	0.00E+00
D-100 developer	7.53	6.13E-03	0.48	0.96	350.4	5.88E-03	1.07E-03	0.0%	0.00E+00
HM-406 penetrant	8.10	0.00E+00	0.032	0.064	23.36	0.00E+00	0.00E+00	0.0%	0.00E+00
DR-60 cleaner	6.43	6.26E-03	0.096	0.192	70.08	1.20E-03	2.19E-04	0.0%	0.00E+00
ZL-67 penetrant	8.26	7.43E-01	0.19	0.38	138.7	2.82E-01	5.15E-02	0.0%	0.00E+00
<i>Emissions - lb/day</i>						2.89E-01			0.00E+00
<i>Subtotal Annual Emissions - TPY</i>							5.28E-02		

EMISSIONS RESULTING FROM SELF CONTAINED SPRAY GUN AND LINE CLEANER

Product	Density (lb/gal)	VOC (lb/gal)	Annual Usage (gal)	Worst Case Annual Usage (gal)	Worst Case VOC Emission (Lbs/day)	Worst Case VOC emissions (ton/yr)	HAP Emissions Combined (%)	Potential Combined HAP Emissions (tons/yr)
Lacquer Thinner	6.70	6.70	110	220	4.04E+00	7.37E-01	75.0%	5.53E-01
<i>Emissions - lb/day</i>					4.04E+00			5.53E-01
<i>Total Annual Emissions - TPY</i>						7.37E-01		

EMISSIONS FROM PROTECTIVE METAL COATING APPLICATION

Product	Density (lb/gal)	VOC (lb/gal)	Annual Usage (gal)	Worst Case Annual Usage (gal)	Worst Case VOC Emission (Lbs/day)	Worst Case VOC emissions (ton/yr)	HAP Emissions Combined (Wt %)	Potential Combined HAP Emissions (tons/yr)
WOCO Penetrating Oil 40	6.70	6.03	55	110	1.82E+00	3.32E-01	5%	1.84E-02
<i>Emissions - lb/day</i>					1.82E+00			1.84E-02
<i>Subtotal Annual Emissions - TPY</i>						3.32E-01		

EMISSIONS RESULTING FROM CLEANER AND SOLVENT USAGE

Product	Density (lb/gal)	VOC (lb/gal)	Annual Usage (gal)	Worst Case Annual Usage (gal)	Worst Case VOC Emission (Lbs/day)	Worst Case VOC emissions (ton/yr)	HAP Emissions Combined (Wt %)	Potential Combined HAP Emissions (tons/yr)
Isopropanol	6.60	6.37	85	170	2.97E+00	5.41E-01	0.0%	0.00E+00
Acetone	6.60	6.31	Exempt				0.0%	
<i>Emissions - lb/day</i>					2.97E+00			0.00E+00
<i>Subtotal Annual Emissions - TPY</i>						5.41E-01		

EMISSIONS RESULTING FROM DEGASSING AND CLEANING TO PREPARE FOR INTERNAL REPAIR

Product	Density (lb/gal)	VOC (lb/gal)	Annual Usage (gal)	Worst Case Annual Usage (gal)	Worst Case VOC Emission (Lbs/day)	Worst Case VOC emissions (ton/yr)	HAP Emissions Combined (Wt %)	Potential Combined HAP Emissions (tons/yr)
Degassing (inert gases released)					0.00E+00	0.00E+00	0.0%	0.00E+00
Isopropanol	6.60	6.37	25	50	8.73E-01	1.59E-01	0.0%	0.00E+00
Acetone	6.60	6.31	Exempt				0.0%	
<i>Emissions - lb/day</i>					8.73E-01			0.00E+00
<i>Subtotal Annual Emissions - TPY</i>						1.59E-01		

TOTAL POTENTIAL VOC EMISSIONS - TPY 1.87

TOTAL COMBINED HAP EMISSIONS - TPY 0.59