

May 13, 2002

Mr. Darryl Zupancic
Manchester Tank and Equipment Company
800-900 X Street
Bedford, Indiana 47421

Re: **093-15412**
Second Administrative Amendment to
Part 70 093-7549-00010

Dear Mr. Zupancic:

Manchester Tank and Equipment Company was issued a permit on November 2, 2000 for a metal pressure vessels manufacturing plant. A letter requesting a new paint application system was received on March 27, 2002. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

- (1) Page 5a has been amended to include the proposed surface coating system description with the other insignificant activities of Condition A.3.
- (2) Page 29a has been created to include a new Section D.2 which incorporates the applicable surface coating system requirements into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SDF

cc: File - Lawrence County
U.S. EPA, Region V
Lawrence County Health Department
Air Compliance Section Inspector - Vaughn Ison
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Manchester Tank and Equipment Company
800-900 X Street
Bedford, Indiana 47421**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: T093-7549-00010	
Issued By: Janet McCabe, Assistant Commissioner Office of Air Quality	Date Issued: November 2, 2000
First Administrative Amendment No.: 093-14249-00010	Date Issued: August 9, 2001
First Minor Permit Modification No.: 093-14395-00010	Date Issued: July 24, 2001
Second Minor Permit Modification No.: 093-14759-00010	Date Issued: October 16, 2001
Second Administrative Amendment No.: 093-15412-00010	Affected Pages: 5a, with 29a added
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Date Issued: May 13, 2002

- (k) One (1) 2 gallon Binks paint pot with a Devilbiss JGA-510 paint gun and SC Binks wand with a 360° circular tip, applying surface coatings to the inside of air brake tanks with maximum primer and finish coat application rates of 0.078 and 0.079 gallons per hour, respectively.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) 2 gallon Binks paint pot with a Devilbiss JGA-510 paint gun and SC Binks wand with a 360° circular tip, applying surface coatings to the inside of air brake tanks with maximum primer and finish coat application rates of 0.078 and 0.079 gallons per hour, respectively.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the paint booth shall not exceed the limits established utilizing the following equation:

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

where: E = rate of emission in pounds per hour,
P = process weight in tons per hour

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Administrative Amendment to an Existing Part 70 Permit

Source Background and Description

Source Name:	Manchester Tank and Equipment Company
Source Location:	800-900 X Street, Bedford, Indiana 47421
County:	Lawrence
SIC Code:	3443
Operation Permit No.:	T093-7549-00010
Operation Permit Issuance Date:	November 2, 2000
Administrative Amendment No.:	093-15412-00010
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed a permit application from Manchester Tank and Equipment Company relating to the addition of:

One (1) 2 gallon Binks paint pot with a Devilbiss JGA-510 paint gun and SC Binks wand with a 360° circular tip, applying surface coatings to the inside of air brake tanks with maximum primer and finish coat application rates of 0.078 and 0.079 gallons per hour, respectively.

Request

Manchester Tank and Equipment Company has recently received an order to produce air brake tanks. One of the specifications for the tanks includes application of primer and finish coatings to the inside of the tanks such that there are no runs, sags, or dirt. To meet this high quality specification requires the addition of the new special paint application system requested in this application.

The new equipment will not allow an increase in production or emissions from any of the existing equipment.

However, the proposed paint system does generate an increase in potential emissions. Based on the information provided by Manchester Tank, all emissions due to the proposed modification are determined to be at exempt levels pursuant to 326 IAC 2-1.1-3(d).

Thus, the proposed paint system shall be incorporated into the existing Part 70 permit via an Administrative Amendment pursuant to 326 IAC 2-7-11(a)(8) which states that modifications that consist of revisions that will not trigger a new applicable requirement or violate a permit term may be incorporated into the Part 70 permit via an administrative amendment.

Existing Approvals

Manchester Tank and Equipment Company received their Part 70 permit (093-7549-00010) on November 2, 2000. The source has been operating under this permit and the following subsequent approvals:

(1) 093-11157-00010	First Significant Source Modification	Date Issued:	11-23-99
(2) 093-14249-00010	First Administrative Amendment	Date Issued:	8-9-01
(3) 093-14347-00010	First Minor Source Modification	Date Issued:	6-12-01
(4) 093-14654-00010	Second Minor Source Modification	Date Issued:	8-23-01

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that this Administrative Amendment 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.

Emission Calculations

UNRESTRICTED POTENTIAL TO EMIT DUE TO THE MODIFICATION:

The unrestricted potential to emit (UPTE) due to the proposed modification includes VOC, PM, PM10, and HAP emissions from the proposed surface coating system. The following calculations determine the UPTE due to the modification:

1. VOC Emissions:

The following calculations determine the surface coating system VOC UPTE based on the worst case coating combinations, respective application rates, coating densities, fraction VOC as applied, 1 unit/hr, emissions before controls, and 8760 hours of operation.

$$X \text{ lb/gal} * X \text{ gal/hr} * \text{Fraction VOC} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \text{tons VOC/yr}$$

Coating	lb/gal	gal/hr	Fraction VOC	tons VOC/yr
Primer	12.63	0.078	0.32	0.32
Finish Coating	10.90	0.079	0.07	0.26
Total				0.58

2. HAP Emissions:

The following calculations determine the surface coating system combined HAP UPTE based on the worst case coating combinations, respective coating densities, wt% combined HAP as applied, 1 unit/hr, emissions before controls, and 8760 hours of operation.

$$X \text{ lb/gal} * X \text{ gal/hr} * \text{Fraction HAP} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \text{tons HAP/yr}$$

Coating	lb/gal	gal/hr	Fraction HAP	tons HAP/yr
Primer	12.63	0.078	0.17	0.73
Finish Coating	10.90	0.079	0.00	0.00
Total				0.73

3. PM and PM10 Emissions:

The following calculations determine the surface coating system PM and PM10 UPTe based on a projected PM(PM10) hourly emissions of 0.13 lb/hr.

$$0.13 \text{ lb PM/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \mathbf{0.56 \text{ tons PM/yr}}$$

PM10 is determined to be equal to PM in this case.

EMISSIONS AFTER CONTROLS:

For the purposes of this application, all emissions are assumed to be uncontrolled.

Potential To Emit

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

This table reflects the PTE before controls due to the modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.56
PM-10	0.56
SO ₂	-
VOC	0.58
CO	-
NO _x	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Pollutant	Potential To Emit (tons/year)
Total Combined HAPs	0.73

The proposed modification shall be incorporated into the existing Part 70 permit via an Administrative Amendment pursuant to 326 IAC 2-7-11(a)(8) which states modifications which revise descriptive information where the revision will not trigger a new applicable requirement or violate a permit term, may be incorporated into a Part 70 permit via an Administrative Amendment.

County Attainment Status

The source is located in Lawrence County.

Pollutant	Status
PM ₁₀	attainment or unclassifiable
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) 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. Lawrence County has been designated as attainment or unclassifiable for ozone. Therefore, the VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2 and 40 CFR 52.21.
- (b) Lawrence County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

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

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Comb. HAPs (tons/yr)
Source PTE	85.96	86.23	0.02	4.25	53.14	3.88	44.12
PSD Levels	250	250	250	250	250	250	-
Part 70 Levels	-	100	100	100	100	100	25

- (a) This existing source is not a major PSD stationary source because no criteria pollutants are emitted at a rate greater than 250 tons per year.
- (b) This existing source is a Title V major stationary source because the combined HAP emissions exceed the applicable level 25 tons/yr.

Source After the Proposed Modification

Source Emissions (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Comb. HAPs (tons/yr)
Source PTE	85.96	86.23	0.02	4.25	53.14	3.88	44.12
Proposed Mod.	0.56	0.56	-	-	0.58	-	0.73
Total	86.79	86.79	0.02	4.25	53.72	3.88	44.85

PSD Levels	250	250	250	250	250	250	-
Part 70 Levels	-	100	100	100	100	100	25

(a) This existing source is still not a major PSD stationary source because no criteria pollutants are emitted at a rate greater than 250 tons per year.

(b) This existing source is still a Title V major stationary source because the combined HAP emissions exceed the applicable level 25 tons/yr.

Federal Rule Applicability

New Source Performance Standards (NSPS):

There are no New Source Performance Standards (326 IAC 12 and 40 CFR Part 60) that become applicable as a result of the proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAPs):

There are no National Emission Standards for Hazardous Air Pollutants (326 IAC 14 and 40 CFR Part 61 and 63) that become applicable as a result of the proposed modification.

State Rule Applicability

Entire State Rule Applicability:

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

The proposed source is required to have a preventive maintenance plan for the emission units and control devices of the source.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because no applicable pollutant emissions exceed the applicable level of 100 tons per year.

326 IAC 5-1-2 (Opacity Limitations)

Opacity shall not exceed an average of 40% in any one 6 minute averaging period. Opacity shall not exceed 60% for more than a cumulative total of fifteen minutes.

Individual State Rule Applicability

326 IAC 6-3 (Process Operations), Paint Systems

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emissions from the paint system shall not exceed the limits established utilizing the following equation:

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

where: E = rate of emission in pounds per hour,
P = process weight in tons per hour

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

The requirements of 326 IAC 8-2-9 do not apply because the daily potential emissions are less than the actual daily emission rate of 15 lb/day.

$$0.56 \text{ tons VOC/yr} * 2000 \text{ lb/ton} * 1/365 \text{ yr/day} = 3.07 \text{ lb VOC/day}$$

326 IAC 8-1-6 (State BACT Requirements)

Although no other Article 8 rule apply to the proposed paint systems, 326 IAC 8-1-6 does not apply because the VOC unrestricted potential to emit from each the surface coating system is less than the applicable level of 25 tons/yr.

Conclusion

The proposed surface coating system shall be constructed and operated pursuant to the requirements specified in Administrative Amendment **093-15412-00010**.