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

Superior Metal Technologies, LLC
9850 East 30th Street
Indianapolis, Indiana 46229

(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.: F097-15522-00127	
Issued by: Originally signed by John B. Chavez John B. Chavez, Administrator Office of Environmental Services	Issuance Date: October 21, 2003 Expiration Date: October 21, 2008

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
C.16 Compliance Response Plan -Preparation, Implementation, Records, and Reports [326 IAC 2-8-4][326 IAC 2-8-5]
C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

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

C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]
C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS

Paint Tunnel and Thermal Oxidizer, B-1, B-2, B-5 and B-6 and TX-1

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

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]
D.1.2 Volatile Organic Compound (VOC) Content Limitations, Booths B-1, B-2 and B-5 and B-6 [326 IAC 8-2-9]
D.1.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]
D.1.4 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]
D.1.5 Particulate Matter (PM) [40 CFR 52 Subpart P]
D.1.6 Particulate [326 IAC 6-3-2(d)]
D.1.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]
D.1.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]
D.1.10 Paint Tunnel Total Enclosure

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

D.1.11 Thermal Oxidizer Temperature
D.1.12 Thermal Oxidizer Induced Fan Amperage
D.1.13 Dry Filter Monitoring

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

D.1.14 Record Keeping Requirements
D.1.15 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS

Insignificant Activities

Certification Form
Emergency Occurrence Form
FESOP Quarterly Report Form
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) and City of Indianapolis, Office of Environmental Services. 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 fabrication, anodizing and surface coating of architectural metal products plant.

Authorized Individual:	Vice President, Environmental Health and Safety
Source Address:	9850 East 30th Street, Indianapolis, Indiana 46229
Mailing Address:	9850 East 30th Street, Indianapolis, Indiana 46229
General Source Phone:	(317) 897-9850
SIC Code:	3479
Source Location Status:	Marion 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) Two (2) Binks automated paint spray booths, identified as B-1 and B-2, contained within a total enclosure paint tunnel maintained under negative pressure, installed in 1989, utilizing an electrostatic air atomization spray application system to coat miscellaneous metal parts at a total maximum surface coating capacity of six (6) gallons of primer per hour at an average conveyor line speed of six (6) feet per minute. These booths use dry filters for particulate matter overspray control, and a natural gas fired thermal oxidizer for VOC control, identified as TX-1, with a maximum heat input of 5.3 MMBtu per hour, and exhausting at one (1) stack, identified as S-OX; and

(b) Two (2) Telkamp manual paint spray booths, identified as B-5 and B-6, contained within a total enclosure paint tunnel maintained under negative pressure, installed in 1989, utilizing an electrostatic air atomization spray application system to coat miscellaneous metal parts at a total maximum surface coating capacity of six (6) gallons of coatings per hour at an average conveyor line speed of six (6) feet per minute. These booths use dry filters for particulate matter overspray control, and a natural gas fired thermal oxidizer for VOC control, identified as TX-1, with a maximum heat input of 5.3 MMBtu per hour, and exhausting at one (1) stack, identified as S-OX.

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) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) One (1) Great Lakes Equipment Company natural gas fired spray booth drying oven, identified as OV-1, and rated at a maximum heat input of 3.2 MMBtu per hour;

(2) One (1) natural gas fired boiler, installed in June of 1989, with a maximum heat input capacity of 6.3 million Btu per hour (MMBtu/hr); and

(3) Miscellaneous sources including 15 space heaters, each rated at 0.1 MMBtu/hr (H1 - H15), 4 HVAC units, each rated at 0.048 MMBtu/hr (HVAC-1 - HVAC-4), 2 air make up units, one rated at 5.0 MMBtu/hr and, one rated at 3.0 MMBtu/hr (AM-1 and AM-2), 1 process tank heater, rated at 1.0 MMBtu/hr (S-10), 1 dry off oven, rated at 1.0 MMBtu/hr (OV-2), and 1 steam boiler rated at 0.382 MMBtu/hr.

(b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hr;

(c) Paved roads and parking lots with public access;

(d) Anodizing system consisting of between 26 and 36 tanks. Each tank contains one of the following solutions; soap, caustic, anodize, color, sealer, water or deionized water rinse;

(e) Alkaline cleaner, chrome phosphate, citrus acid and rinse tanks and an associated dry off oven for miscellaneous metal parts cleaning in preparation for surface coating application(s);

(f) Storage tanks with capacity less than or equal to 1000 gallons and annual throughputs less than 12,000 gallons. Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids;

(g) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;

(h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment;

(i) Closed loop heating and cooling systems;

(j) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1%;

(k) Heat exchanger cleaning and repair;

(l) Purging of 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; and

(m) Blowdown for any of the following: sight glass, boiler, compressor, pump or 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 City of Indianapolis, Office of Environmental Services 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) deleted

by 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 and 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 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 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

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, Indiana 46221

(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 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 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), 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.

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and 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 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;

IDEM, OAQ:
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

or

OES:
Telephone No.: 317-327-2237
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

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, Indiana 46221

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 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 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

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, Indiana 46221

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 and 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 and 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 and OES, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or 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 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

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, Indiana 46221

(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 OES on or before the date it is due.

(2) If IDEM, OAQ and 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 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 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

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, Indiana 46221

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

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, Indiana 46221

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 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 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][IC13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, 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

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, Indiana 46221

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 that 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.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

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, Indiana 46221

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

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, Indiana 46221

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 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 OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and OES, if the source submits to IDEM, OAQ, and 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.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ, and OES approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.16 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 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 and OES of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) 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.17 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, and OES, that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ, and OES, may extend the retesting deadline.

(c) IDEM, OAQ, and OES, reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require 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.18 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

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, Indiana 46221

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 OES on or before the date it is due.

C.19 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 OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or 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.20 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

Office of Environmental Services
Administration Building
2700 South Belmont Ave.
Indianapolis, Indiana 46221

(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 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.21 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)]:

(a) Two (2) Binks automated paint spray booths, identified as B-1 and B-2, contained within a total enclosure paint tunnel maintained under negative pressure, installed in 1989, utilizing an electrostatic air atomization spray application system to coat miscellaneous metal parts at a total maximum surface coating capacity of six (6) gallons of primer per hour at an average conveyor line speed of six (6) feet per minute. These booths use dry filters for particulate matter overspray control, and a natural gas fired thermal oxidizer for VOC control, identified as TX-1, with a maximum heat input of 5.3 MMBtu per hour, and exhausting at one (1) stack, identified as S-OX; and

(b) Two (2) Telkamp manual paint spray booths, identified as B-5 and B-6, contained within a total enclosure paint tunnel maintained under negative pressure, installed in 1989, utilizing an electrostatic air atomization spray application system to coat miscellaneous metal parts at a total maximum surface coating capacity of six (6) gallons of coatings per hour at an average conveyor line speed of six (6) feet per minute. These booths use dry filters for particulate matter overspray control, and a natural gas fired thermal oxidizer for VOC control, identified as TX-1, with a maximum heat input of 5.3 MMBtu per hour, and exhausting at one (1) stack, identified as S-OX.

(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.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4][326 IAC 2-2]

(a) The total VOC usage at the four (4) paint spray booths, including VOC cleaners and solvents, shall be limited to less than 620.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit, in conjunction with D.1.1(b), limits the total potential to emit from the coating facilities to less than 99.3 tons per twelve (12) consecutive month period.

(b) Pursuant to FESOP No. F097-7881-00127, issued on January 22, 1998, operation of the Paint Tunnel as a total enclosure, and an overall efficiency of the capture and control device identified as TX-1, shall be no less than eighty-four percent (84%) efficient. Compliance with this limitation shall also result in compliance with D.1.2(c).

Compliance with this condition, including the potential to emit for insignificant activities, is required to limit the source-wide potential to emit of VOC to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 (Part 70) are not applicable to the source. Compliance with this condition shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) not applicable to this source.

D.1.2 Volatile Organic Compound (VOC) Content Limitations, Booths B-1, B-2 and B-5 and B-6 [326 IAC 8-2-9][326 IAC 8-1-2]

(a) Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere of VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

(b) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from each of the B-1, B-2, B-5 and B-6 spray booths shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where:

L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
D= Density of VOC in coating in pounds per gallon of VOC;
E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual density shall be used to determine compliance of these surface coating operations using the compliance methods in 326 IAC 8-1-2 (a).

(c) The pounds of VOC per gallon of coating solids shall be limited to less than 6.67 pounds of VOC per gallon of coating solids as applied.

(d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the thermal oxidizer shall not be less than 74.7%. Compliance with condition D.1.1(b) shall result in compliance with this requirement.

D.1.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (f), all solvents sprayed from the application equipment of booths B-1, B-2, B-5 and B-6 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.4 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

(a) The total usage of any single hazardous air pollutant (HAP) at the four (4) paint spray booths shall be limited to less than 62.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition, in conjunction with D.1.1(b), shall limit the source-wide potential to emit a single HAP to less than 10 tons per twelve (12) consecutive month period.

(b) The total usage of the combined hazardous air pollutants (HAPs) at the four (4) paint spray booths shall be limited to less than 154.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition, in conjunction with D.1.1(b), and including the potential to emit of insignificant activities, shall limit the source-wide potential to emit total HAPs to less than 25 tons per 12 consecutive month period.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

D.1.5 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from each of the four (4) paint spray booths (B-1, B-2, B-5 and B-6) 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:

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

D.1.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from each of the surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.7 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 these facilities and their control devices.

Compliance Determination Requirements

D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The permittee shall conduct a performance test to verify VOC overall (capture and control) efficiency as per condition D.1.1 for the paint tunnel and thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from April 18, 2001, the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a), the Permittee shall operate the paint tunnel total enclosure and thermal oxidizer at all times of surface coating operations to achieve compliance with conditions D.1.1, D.1.2 and D.1.4.

D.1.10 Paint Tunnel Total Enclosure

Pursuant to FESOP No. F097-7881-00127, issued on January 22, 1998, determination of a total enclosure, as defined by 40 CFR Part 51 Method 204, shall be made by each of the following methods:

(a) Any natural draft opening must be at least four (4) equivalent diameters from spray booths B-1, B-2, B-5 and B-6;

(b) the total area of all natural draft openings shall not exceed five (5) percent of the surface area of the enclosures four walls, floor and ceiling;

(c) The direction of flow through all natural draft openings shall be into the paint tunnel. The average facial velocity of air through all natural draft openings shall be at least two hundred (200) feet per minute;

(d) All paint tunnel access doors and windows shall be closed during operation.

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

D.1.11 Thermal Oxidizer Temperature

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average and shall not be less than 1200 ^{0}F, or the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with the limits in conditions D.1.1 and D.1.2, as approved by IDEM and OES.

(b) The permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as stated in paragraph (a). A 3-hour average temperature that is below this value is not a deviation from this permit. 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.

D.1.12 Thermal Oxidizer Induced Fan Amperage

The fan amperage on the induced draft fan at the thermal oxidizer shall be observed at least once per shift when the Paint Tunnel surface coating is in operation. When for any one reading, the fan amperage is outside the normal range of 27 to 33 amps, or that range established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C -Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside this range is not a deviation from this permit. 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.

D.1.13 Dry Filter 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 stack S-OX 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.

(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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.14 Record Keeping Requirements

(a) To document compliance with conditions D.1.1, D.1.2 and D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission and usage limits established in conditions D.1.1 and D.1.2, and the HAP usage limits established in D.1.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC and HAP content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

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

(3) The weight of the VOC per volume of coating solids, less water applied each day (lb VOC / gal solids).

(4) The monthly cleanup solvent usage.

(5) The total VOC and HAP (single and combined) usage for each month.

(6) The weight of VOC and HAP (single and combined) emitted for each compliance period.

(b) To document compliance with conditions D.1.11 and D.1.12, the Permittee shall maintain the following:

(1) Continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test.

(2) Records of the fan amperage taken once per shift.

(c) To document compliance with Conditions D.1.7 and D.1.13, 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.1.15 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.4 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 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)]:

The following insignificant activities as defined in 326 IAC 2-7-1(21):

Natural gas fired boiler with maximum heat input capacity of 6.3 million Btu 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.2.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from the boiler, based on a total heat input rate of 6.3 MMBtu per hour, shall be limited to 0.6 pound per MMBtu heat input.

This limitation is based on the following equation:

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

where: Pt = Pounds of particulate matter emitted per MMBtu heat input.
Q = Total source maximum operating capacity rating in MMBtu per hour.

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: Superior Metal Technologies
Source Address: 9850 East 30th street, Indianapolis, Indiana 46229
Mailing Address: 9850 East 30th street, Indianapolis, Indiana 46229
FESOP No.: F097-15522-00127

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:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 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

AND

CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
Administration Building
2700 South Belmont Ave.
Indianapolis, IN 46221
Phone: 317-327-2237
Fax: 317-327-2274

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Superior Metal Technologies
Source Address: 9850 East 30th street, Indianapolis, Indiana 46229
Mailing Address: 9850 East 30th street, Indianapolis, Indiana 46229
FESOP No.: F097-15522-00127:

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

FESOP Quarterly Report

Source Name: Superior Metal Technologies
Source Address: 9850 East 30th street, Indianapolis, Indiana 46229
Mailing Address: 9850 East 30th street, Indianapolis, Indiana 46229
FESOP No.: F097-15522-00127:
Facility: Four (4) spray booths (B-1, B-2, B-5 and B-6)
Parameter: VOC, single and combined HAPs usages
Limit:
(a) total VOC usage at the four (4) paint spray booths, including VOC cleaners and solvents, shall be limited to less than 620.6 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.
(b) total usage of any single hazardous air pollutant (HAP) at the four (4) paint spray booths shall be limited to less than 62.5 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.
(c) total usage of the combined hazardous air pollutants (HAPs) at the four (4) paint spray booths shall be limited to less than 154.8 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

YEAR: _____

Month	Total Usage This Month (tons)			Total Usage Previous 11 Months (tons)			Total 12-Month Usage (tons)		
	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs	VOC	Single* HAP	Combined HAPs
Month 1									
Month 2									
Month 3									

*List the single HAP with the greatest emission rate

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

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

Source Name: Superior Metal Technologies
Source Address: 9850 East 30th street, Indianapolis, Indiana 46229
Mailing Address: 9850 East 30th street, Indianapolis, Indiana 46229
FESOP No.: F097-15522-00127

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

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".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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:	

Page 2 of 2

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:	**Superior Metal Technologies, LLC (formerly Aluminum Finishing Corporation)**
Source Location:	**9850 East 30th Street, Indianapolis, Indiana 46229**
County:	**Marion**
SIC Code:	**3479**
Operation Permit No.:	**F097-15522-00127**
Permit Reviewer:	**Seema Roy/EVP**

On September 5, 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 Superior Metal Technologies, LLC had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal relating to the operation of a stationary fabrication, anodizing and surface coating of architectural metal products source. 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.

No written comments were received either from the source or any other party.

Upon further review, the OES has decided to make the following changes to the FESOP Renewal. Bolded language has been added and the language with a line through it has been deleted.

1. Condition B.10 (Compliance with Permit Conditions) has been removed from the B section and has been added to the FESOP title page instead.

~~B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]~~

~~(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:~~

~~(1) Enforcement action;~~

~~(2) Permit termination, revocation and reissuance, or modification; and~~

~~(3) Denial of a permit renewal application.~~

~~(b) 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.~~

~~(c) 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.~~

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

Superior Metal Technologies, LLC
9850 East 30th Street
Indianapolis, Indiana 46229

(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.

2. Condition C.16 (b)(3) notification requirement has been modified to apply only to situations where the emissions unit will continue to operate for an extended time while the compliance monitoring parameter is out of range. It is intended to provide the OAQ and OES an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with applicable requirements.

   (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 and OES ~~shall be promptly notified~~ 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.

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:	**Superior Metal Technologies, LLC (formerly Aluminum Finishing Corporation)**
Source Location:	**9850 East 30th Street, Indianapolis, Indiana 46229**
County:	**Marion**
SIC Code:	**3479**
Operation Permit No.:	**F097-15522-00127**
Permit Reviewer:	**Seema Roy/EVP**

The Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) have reviewed a FESOP renewal application from Superior Metal Technologies, LLC (formerly Aluminum Finishing Corporation) relating to the operation of a stationary fabrication, anodizing and surface coating of architectural metal products source. Aluminum Finishing Corporation was issued FESOP 097-7881-00127 on January 22, 1998. On March 13, 2003, OES received a letter from Superior Metal Technologies, LLC indicating their purchase of source operations from Aluminum Finishing Corporation. Therefore, the source name and ownership of such has been changed from Aluminum Finishing Corporation to Superior Metal Technologies, LLC. OES also received a letter on September 5, 2002 from the prior source owner, Aluminum Finishing Corporation. This letter requested that the minimum thermal oxidizer operating temperature specified in Condition D.1.10(b) of the original FESOP be revised. This request, identified by IDEM request No. 097-16096, has been withdrawn by the current source owner, Superior Metal technologies, LLC, during this renewal review, as the source continues to comply with the existing temperature limit.

Permitted Emission Units and Pollution Control Equipment

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

(a) Two (2) Binks automated paint spray booths, identified as B-1 and B-2, contained within a total enclosure paint tunnel maintained under negative pressure, installed in 1989, utilizing an electrostatic air atomization spray application system to coat miscellaneous metal parts at a total maximum surface coating capacity of six (6) gallons of primer per hour at an average conveyor line speed of six (6) feet per minute. These booths use dry filters for particulate matter overspray control, and a natural gas fired thermal oxidizer for VOC control, identified as TX-1, with a maximum heat input of 5.3 MMBtu per hour, and exhausting at one (1) stack, identified as S-OX; and

(b) Two (2) Telkamp manual paint spray booths, identified as B-5 and B-6, contained within a total enclosure paint tunnel maintained under negative pressure, installed in 1989, utilizing an electrostatic air atomization spray application system to coat miscellaneous metal parts at a total maximum surface coating capacity of six (6) gallons of coatings per hour at an average conveyor line speed of six (6) feet per minute. These booths use dry filters for particulate matter overspray control, and a natural gas fired thermal oxidizer for VOC control, identified as TX-1, with a maximum heat input of 5.3 MMBtu per hour, and exhausting at one (1) stack, identified as S-OX.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new facilities proposed 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) Natural gas fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

(1) One (1) Great Lakes Equipment Company natural gas fired spray booth drying oven, identified as OV-1, with a maximum heat input rate of 3.2 MMBtu per hour;

(2) One (1) natural gas fired boiler, installed in June of 1989, with a maximum heat input rate of 6.3 million Btu per hour (MMBtu/hr); and

(3) Miscellaneous sources including 15 space heaters, each rated at 0.1 MMBtu/hr (H1 - H15), 4 HVAC units, each rated at 0.048 MMBtu/hr (HVAC-1 - HVAC-4), two air make up units, one rated at 5.0 MMBtu/hr and one rated at 3.0 MMBtu/hr (AM-1 and AM-2), one process tank heater, rated at 1.0 MMBtu/hr (S-10), one dry off oven, rated at 1.0 MMBtu/hr (OV-2), and one steam boiler rated at 0.382 MMBtu/hr.

(b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hr;

(c) Paved roads and parking lots with public access;

(d) Anodizing system consisting of between 26 and 36 tanks. Each tank contains one of the following solutions; soap, caustic, anodize, color, sealer, water or deionized water rinse;

(e) Alkaline cleaner, chrome phosphate, citrus acid and rinse tanks and an associated dry off oven for miscellaneous metal parts cleaning in preparation for surface coating application(s);

(f) Storage tanks with capacity less than or equal to 1000 gallons and annual throughputs less than 12,000 gallons. Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids;

(g) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;

(h) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment;

(i) Closed loop heating and cooling systems;

(j) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1%;

(k) Heat exchanger cleaning and repair;

(l) Purging of 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; and

(m) Blowdown for any of the following: sight glass, boiler, compressor, pump or cooling tower.

Existing Approvals

The source has been operating under the following previous approvals:

(a) FESOP 097-7881-00127, issued on January 22, 1998;

(b) First Administrative Amendment 097-11289-00127, issued on April 4, 2000; and

(c) Second Administrative Amendment 097-14783-00127, issued on August 20, 2001.

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 have been changed in this FESOP:

(a) All construction conditions from all previously issued permits:

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

(b) FESOP 097-7881-00127, issued on January 22, 1998:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-2(b) & (c)][326 IAC 8-2-9][326 IAC 8-2-4]

(a) Pursuant to 326 IAC 8-2-9 (Surface Coating Emission Limitations: Miscellaneous Metal Coating Operations), the Permittee shall not cause, allow or permit the discharge into the atmosphere of any volatile organic compounds (VOC) in excess of the following:

(1) Four and three tenths (4.3) pounds per gallon of coating, excluding water, delivered to a coating applicator that applies clear coatings. A clear coating is a coating that lacks color or opacity and is transparent and uses the undercoat as a reflectant base or undertone color.

(2) Three and five tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator in a coating applicator system that is air dried or forced warm air dried at temperatures up to one hundred ninety four (194) degrees Fahrenheit.

(3) Three and five tenths (3.5) pounds per gallon of coating, excluding water, delivered to a coating applicator that applies extreme performance coatings. Extreme performance coatings are coatings designed for exposure to temperatures consistently above ninety five (95) degrees Celsius, detergents, abrasives or scouring agents, solvents, corrosive atmospheres, outdoor weather at all times, or similar environmental conditions.

(4) Three (3.0) pounds per gallon of coating, excluding water, delivered to a coating applicator for all other coatings and coating application systems.

(b) If more than one (1) emission limitation in Section D.1.1(a) applies to a specific coating, then the least stringent emission limitation shall be applied.

(c) Pursuant to 326 IAC 8-2-9, 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.

(d) Pursuant to 326 IAC 2-8-4, VOC emissions from the Paint Tunnel surface coating operations shall not exceed 98.9 tons per rolling 365 consecutive day period. This limitation is equivalent to surface coating application(s) at maximum capacity, operation of the Paint Tunnel as a total enclosure and an overall efficiency of the capture and control device of no less than 84.0%.

The operation of the Paint Tunnel as a total enclosure and an overall efficiency of the capture and control device identified as Emission Unit ID TX-1 of no less than eighty four percent (84%) efficiency, as determined by 326 IAC 8-1-2(b) & (c), makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

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

(b) Pursuant to 326 IAC 8-1-2(b) and (c), the overall efficiency of the Paint Tunnel capture system and the thermal oxidizer control device identified as Emission Unit ID TX-1 shall be no less than the equivalent overall efficiency which shall be calculated by the following equation:

$$O = \frac{V - E}{V} \; x \; 100$$

Where: O = Equivalent overall efficiency of the capture and control device as a percentage.

V = The actual VOC content of the coating or if multiple coatings are used, the daily weighted average of VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 (General Provisions Relating To VOC Rules: Testing Procedures) in units of pounds of VOC per gallon of coating solids as applied.

E = Equivalent Emission limit in pounds of VOC per gallon of coating solids as applied.

Reason changed: Condition D.1.1 establishes the VOC emission limits for the coating facilities. The coating of miscellaneous metal parts at this source is subject to 326 IAC 8-2-9, with an applicable limit of 3.5 pounds per gallon of coating, excluding water, delivered to a coating applicator for forced warm air dried coatings. The coatings used by the source are non-compliant coatings with respect to this limitation, and the source utilizes a thermal oxidizer to control the VOC emissions pursuant to the requirements of 326 IAC 8-1-2(b) and (c). 326 IAC 8-1-2(b) establishes an equivalent emission limit for coating facilities, and the minimum control system requirements are established 326 IAC 8-1-2(c). Condition D.1.1, now as D.1.2 in this renewal, is revised to include: the applicable limit under 326 IAC 8-2-9, rather than all limits of the rule; the computed equivalent emission limit pursuant to 326 IAC 8-1-2(b); and the required minimum control system efficiency needed to comply with the equivalent emission limit, which replaces D.1.7(b).

Condition D.1.1(d) also establishes a total VOC emission rate limit for surface coating, such that the requirements of 326 IAC 2-7 (Part 70) do not apply to this source. This emission rate limit is based on a control system efficiency that reduces the uncontrolled VOC emission rate from coating operations, such that the source-wide emission rate is less than 100 tons per year. The efficiency is established in Section D.1 as 84 percent (%). While D.1.1(d) specifies this control system efficiency, the condition does not include an allowable VOC usage rate for the coating operations. The usage rate is needed, along with the control system efficiency, to make the emission rate limit enforceable. Condition D.1.1(d), now as D.1.1, is therefore revised to include the allowable VOC input usage limitation. This limit is based on a consecutive twelve (12) month compliance period, rather than the existing consecutive 365 day compliance period. This is consistent with current OAQ permit approvals. Additionally, the VOC limit is adjusted to reflect the 326 IAC 2-8 program limits of “less than” 100 tons per year, rather than 99 tons per year in the original FESOP. This format is also consistent with current IDEM, OAQ permit approvals. Related record keeping and quarterly reporting requirements for VOC usage are also added to the permit for purposes of practical enforceability.

(c) FESOP 097-7881-00127, issued on January 22, 1998:

D.1.2 Hazardous Air Pollutants (HAP’s) [326 IAC 2-8-4] [326 IAC 20]

Pursuant to 326 IAC 2-8-4 (FESOP: Permit Content) and 326 IAC 20 (Hazardous Air Pollutants);

(a) Any single regulated HAP emissions from the Paint Tunnel surface coating operations shall not exceed 9.4 tons per rolling 365 consecutive day period. This limitation is equivalent to surface coating application(s) at maximum capacity, operation of the Paint Tunnel as a total enclosure and an overall efficiency of the capture and control device identified as Emission Unit ID TX-1 of no less than 84.0% efficiency.

(b) Any combination sum of regulated HAPs emissions from the Paint Tunnel surface coating operations shall not exceed 24.0 tons per rolling 365 consecutive day period. This limitation is equivalent to surface coating application(s) at maximum capacity, operation of the Paint Tunnel as a total enclosure and an overall efficiency of the capture and control device identified as Emission Unit ID TX-1 of no less than 84.0% efficiency.

The operation of a Paint Tunnel as a total enclosure and an overall efficiency of the capture and control device identified as Emission Unit ID TX-1 of no less than 84.0% efficiency makes 326 IAC 2-7 (Part 70 Permit Program) not applicable.

Reason changed: Consistent with the discussion on D.1.1 above, allowable single and combined HAP input usage limits are added to Condition D.1.2 (now D.1.4). These input usage limits, in combination with the control system efficiency, shall limit the respective single and combined HAP emission rate limits such that 326 IAC 2-7 (Part 70) does not apply. Related record keeping and reporting requirements are also added to the permit for purposes of practical enforceability.

Enforcement Issue

Aluminum Finishing Corporation was issued a FESOP (F097-7881-00127) on January 22, 1998 and submitted a permit renewal application to IDEM, OAQ and City of Indianapolis, Office of Environmental Services (OES) on April 17, 2002. Aluminum Finishing Corporation was issued a Notice of Violation (NOV) on September 27, 2002, by the OES. Aluminum Finishing Corporation filed a Notice of Bankruptcy on October 7, 2002 in the United states Bankruptcy Court, Southern District of Indiana, and was declared bankrupt on January 27, 2003. Consequently, a Motion for Dismissal of the NOV was filed by OES and approved by the State of Indiana Administrative Hearing Officer on January 27, 2003. Subsequent to this approval, OES was notified on March 13, 2003 that Superior Metal Technologies, LLC took over operations from Aluminum Finishing Corporation. Permit F097-7881-00127 was transferred to Superior Metal Technologies, LLC and, based on the January 27, 2003 NOV dismissal, no prior enforcement issues were imparted to the new owner.

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 April 17, 2002.

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 to 5).

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	Unrestricted Potential Emissions (tons/yr)
PM	less than 100
PM-10	less than 100
SO_2	less than 100
VOC	greater than 250
CO	less than 100
NO_x	less than 100

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

HAP's	Unrestricted Potential Emissions (tons/yr)
Xylene	greater than 10
Toluene	greater than 10
Methyl Isobutyl Ketone	greater than 10
Ethyl Benzene	greater than 10
Dimethyl Phthalate	greater than 10
Glycol Ethers	greater than 10
Chromium Coumpounds	less than 10
TOTAL	greater than 25

(a) The unrestricted potential emissions of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The unrestricted potential emissions of any single HAP are equal to or greater than ten (10) tons per year and the unrestricted potential emissions of a combination HAPs are greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.2*
PM-10	0.2
SO_2	0.02
VOC	0.8
CO	3.4
NO_x	4.0

* PM assumed equal to the reported pollutant, PM-10.

Potential to Emit After Issuance

The source, issued a FESOP on January 22, 1998, 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. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP (F097-7881-00127), issued on January 22, 1998.

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	PM	PM-10	SO_2	VOC	CO	NO_x	HAPs
Surface Coating	3.93(1)	3.93(1)	0.00	<99.3(2)	0.00	0.00	Less than 24.76 tons/yr for combination and 10 tons/yr for any single
Insignificant Activities (Natural Gas Combustion)	0.24	0.96	0.08	0.70	10.62	12.65	0.24
Total PTE After Issuance	4.17	4.89	0.08	<100	10.62	12.65	Less than 25 tons/yr for combination and 10 tons/yr for any single

Notes:
1. Pursuant to 326 IAC 6-3-2, reflects the use of particulate matter control devices which shall be operated at all times the processes are in operation. Assumes all PM equal to PM_{10}.
2. Usage limit required to limit the potential to emit of VOC to less than 100 tons per 12 consecutive month period such that the requirement of 326 IAC 2-7 shall not apply.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO_2	maintenance
NO_2	attainment
Ozone	maintenance
CO	attainment
Lead	maintenance

(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. Marion County has been designated as maintenance for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Marion County has been classified as attainment, maintenance or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

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.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

The boiler for this source, installed in June of 1989, is not subject to New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc). This subpart applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to 2.9 MW (10 million Btu/hr). The boiler has a maximum design heat input capacity of 6.3 million Btu per hour, less than 10 million Btu per hour, and therefore it is not subject to the requirements of this rule.

(b) There are no National Emission 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 since the source is not a major source of hazardous air pollutants pursuant to 40 CFR Part 63.2. The source shall continue to limit coating material usage such that single and combined HAP emissions are limited to less than 10 tpy and 25 tpy, respectively, and remain an area source of HAPs pursuant to 40 CFR Part 63.2.

The United States Environmental Protection Agency (EPA) has established the *Miscellaneous Metal Part and Products (Surface Coating)* source category as requiring hazardous air pollutant control. The EPA proposed such requirements on August 13, 2002, and has tentatively established August 31, 2003 as the final rule promulgation date. Upon final promulgation, this rule will be applicable to specified metal coating operations that are major sources of, or are located at, a major source of hazardous air pollutants (HAPs) as defined in 40 CFR 63.2. As a FESOP source, this plant will not be subject to the pending NESHAP for source categories, 326 IAC 20, (40 CFR 63, Subpart MMMM), *National Emission Standards for Miscellaneous Metal Part and Products*, for its metal parts coating processes since the source is not a major source of hazardous air pollutants pursuant to 40 CFR Part 63.2.

There are still no National Emission Standards for Hazardous Air Pollutants (NESHAPs) for source categories (326 IAC 20 and 40 CFR Part 63) applicable to this source.

(c) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because it is not a major source of hazardous air pollutant (HAP) emissions (i.e., the source does not have the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs, after enforceable controls and/or limitations).

(d) 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.

State Rule Applicability - Entire Source

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

The source has submitted a Preventive Maintenance Plan (PMP) in June of 2000. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 1-7 (Stack Height Provisions)

All sources having exhaust gas stacks through which a potential of twenty-five (25) tons per year or more of particulate matter (PM) are emitted and for which construction commenced after June 19, 1979 shall be constructed using good engineering practice (GEP) stack height. The paint booths, at maximum capacity and an estimated transfer efficiency of 75 %, have combined uncontrolled potential to emit PM of 78.6 tons per year (see Appendix A, Page 2 of 5). With the use of dry filters at an estimated 95% PM control efficiency, actual emissions at maximum capacity and 8760 hours of operation are, approximately, 4 tpy. 326 IAC 1-7-5 specifically exempts sources from the GEP stack height requirement if actual emissions (after controls) are less than 25 tpy.

326 IAC 2-2 (Prevention of Significant Deterioration, PSD)

This source was constructed in 1989, after the August 7, 1977 rule applicability date. Although constructed after the applicability date, this source is not considered a major source because it is not one of the 28 listed source categories and it has always maintained the potential to emit after enforceable controls of less than 250 tons per year of any criteria pollutant. As a FESOP source the total input usage of VOC shall be limited to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration, PSD) shall not apply.

326 IAC 2-6 (Emission Reporting)

This rule applies to all sources located in the specifically listed counties (Clark, Elkhart, Floyd, Lake, Marion, Porter, St. Joseph, and Vanderburgh), which have the potential to emit volatile organic compounds (VOC) or oxides of nitrogen (NO_x) into the ambient air at levels equal to or greater than ten (10) tons per year. The source is subject to this rule, because it is located in Marion county and has the potential to emit more than ten (10) tons per year of VOC and oxides of nitrogen (NO_x). Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year 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)(Emission Statement Operating Year).

326 IAC 2-8-4 (FESOP)

Pursuant to this rule the following condition shall apply to this fabrication, anodizing and surface coating of architectural metal products source:

(a) The total VOC usage at the four (4) paint spray booths, including VOC cleaners and solvents, shall be limited to less than 620.6 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This usage limit, in conjunction with (b) stated below, limits the total potential to emit from the coating facilities to less than 99.3 tons per twelve (12) consecutive month period.

(b) Pursuant to FESOP No. F097-7881-00127, issued on January 22, 1998, operation of the paint tunnel as a total enclosure, and an overall efficiency of the capture and control device identified as TX-1, shall be no less than eighty-four percent (84%) efficient. Compliance with this limitation shall also result in compliance with 326 IAC 8-2-9 (Miscellaneous metal Coating).

Compliance with conditions (a) and (b) above, including the potential to emit for insignificant activities, is required to limit the source-wide potential to emit of VOC to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 (Part 70) are not applicable to the source.

(c) The total usage of any single hazardous air pollutant (HAP) at the four (4) paint spray booths shall be limited to less than 62.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition, in conjunction with (b) stated above, shall limit the source-wide potential to emit a single HAP to less than 10 tons per twelve (12) consecutive month period.

(d) The total usage of the combined hazardous air pollutants (HAPs) at the four (4) paint spray booths shall be limited to less than 154.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this condition, in conjunction with (b) stated above, and including the potential to emit of insignificant activities, shall limit the source-wide potential to emit total HAPs to less than 25 tons per 12 consecutive month period.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

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 2-4.1-1 (New Source Toxics Control)

Pursuant to 326 IAC 2-4.1-1 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the PTE 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT).

Booths B-1, B-2, B-5 and B-6 were all installed in 1989, prior to the July 27, 1997 rule applicability date. Therefore, the requirements of this rule do not apply to booths B-1, B-2, B-5 and B-6.

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 natural gas fired boiler for this source, with a maximum heat input capacity of 6.3 million Btu per hour (MMBtu/hr), is subject 326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating specified in 326 IAC 6-2-1(d)), because it was installed in June of 1989, 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 the boiler, based on a total heat input rate of 6.3 MMBtu per hour, shall be limited to 0.6 pound per MMBtu heat input.

This limitation is based on the following equation:

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

where: Pt = Pounds of particulate matter emitted per MMBtu heat input.
Q = Total source maximum operating capacity rating in MMBtu per hour.
Q = 6.3 MMBtu/hr

$$Pt = \frac{1.09}{(6.3)^{0.26}} = 0.68 \text{ pound per MMBtu heat input.}$$

However, pursuant to 326 IAC 6-2-4(a), for Q less than 10 MMBtu/hr, PM emissions shall not exceed 0.6 pound per MMBtu heat input.

Therefore, the PM emissions form the boiler shall be limited to 0.6 pound per MMBtu heat input.

Based on the calculation, the particulate matter emission from the boiler is 0.07 pound per MMBtu heat input (see page 4 of 5, Appendix A). Therefore, the boiler will comply with 326 IAC 6-2-4.

326 IAC 6-3-2 (Process Operations)

(a) Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the four (4) paint spray booths (B-1, B-2, B-5 and B-6) 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:

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

Under the rule, particulate from the surface coating processes shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications. The source shall comply with this requirement by continuing to use dry filters for each coating booth.

(b) The welding equipment, as an insignificant activity, is not subject 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). This activity is exempt from this rule pursuant to 326 IAC 6-3-1(b)(9) because it uses on an average about 2 pounds of wielding wire per day (less than the 625 lbs of wire/day threshold).

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 (SO_2) to comply with the emission limitations and test compliance methods stated in the rule. As a natural gas fired combustion unit, the 6.3 MM Btu/hr boiler, as an insignificant activity, does not have a PTE of SO_2 at or above the rule emission rate thresholds; therefore, 326 IAC 7-1.1 is not applicable to this facility.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8.

The four (4) paint spray booths, B-1, B-2, B-5 and B-6 are not subject to this rule because they are subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating).

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

(a) 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 spray booths, B-1, B-2, B-5 and B-6, shall each be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

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.

Based on the MSDS submitted by the source and calculations made, (see Appendix A Page 2 of 5), coatings applied in each booth exceed 3.5 pounds of VOC per gallon of coating less water. The source has installed add on pollution control equipment in the form of a total enclosure and a thermal oxidizer, the Paint Tunnel and TX-1 respectively, and demonstrates compliance with the applicable VOC content limitation by employing a compliance method found in 326 IAC 8-1-2(a)(2) and an equivalent limitation outlined in 326 IAC 8-1-2(b) and (c), as follows:

(b) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from each of the B-1, B-2, B-5 and B-6 spray booths shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

E = L / (1 - (L/D))

Where:

L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
D= Density of VOC in coating in pounds per gallon of VOC;
E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

E = 3.5 / (1-(3.5/7.36)) = 6.67

Actual density shall be used to determine compliance of these surface coating operations using the compliance methods in 326 IAC 8-1-2 (a).

(c) The pounds of VOC per gallon of coating solids shall be limited to less than 6.67 pounds of VOC per gallon of coating solids as applied.

(d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

$$O = \frac{26.32 - 6.67}{26.32} \times 100 = 74.7\ \%$$

The overall efficiency of the thermal oxidizer shall not be less than 74.7%.

Based on the information provided by the source, the efficiency of the thermal oxidizer is 84%. Therefore, the source is in compliance with this requirement.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to facilities commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source is not subject to this rule because it is subject to 326 IAC 8-2-9.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Marion County. Therefore, this rule is not applicable to this source.

Testing Requirements

All testing requirements from FESOP No. F097-7881-00127, issued on January 22, 1998, are incorporated into this FESOP, as follows:

The Permittee shall conduct a performance test to verify VOC capture and control efficiency for the paint tunnel and thermal oxidizer utilizing methods as approved by the Commissioner, at least once every five years from April 18, 2001, the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Previous stack tests to comply with this requirement were conducted on April 18, 2001.

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.

The compliance monitoring requirements applicable to this source are as follows:

The four (4) paint spray booths, B-1, B-2, B-5 and B-6 have applicable compliance monitoring conditions as specified below:

(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 stack S-OX 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.

(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.

(d) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average and shall not be less than 1200 ^{0}F, or the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in 326 IAC 8-2-9 (Miscellaneous Metal Coating) as approved by IDEM and OES.

Note: The system output is revised herein to reflect a 3-hour average, consistent with current IDEM compliance requirements for such monitoring systems. This revises the 1-hour average compliance monitoring requirement of the original FESOP.

(e) The permittee shall take appropriate response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as stated in paragraph (a). A 3-hour average temperature that is below this value is not a deviation from this permit. 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.

(f) The fan amperage on the induced draft fan at the thermal oxidizer shall be observed at least once per shift when the paint tunnel surface coating is in operation. When for any one reading, the fan amperage is outside the normal range of 27 to 33 amps, or that range established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C -Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside this range is not a deviation from this permit. 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 and the thermal oxidizer for the surface coating facilities must operate properly to ensure compliance with 326 IAC 2-2, 326 IAC 5-1 (Opacity), 326 IAC 6-3-2 (Process Operations), 326 IAC 8-1-2(b) and (c), 326 IAC 8-2-9 (Miscellaneous Metal Coating), and 326 IAC 2-8-4 (FESOP).

Conclusion

The renewed operation of this fabrication, anodizing and surface coating of architectural metal products source shall be subject to the conditions of the attached proposed FESOP No.: F-097-15522-00127.

Appendix A: Emission Calculations

Company Name: Superior Metal Technologies, LLC (formerly Aluminum Finishing Corporation)
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
FESOP renewal: F097-15522-00127
Reviewer: Seema Roy/EVP

Uncontrolled Potential Emissions (tons/year)

	Emissions Generating Activity		
Pollutant	Natural Gas Combustion	Surface Coating	**TOTAL**
PM	0.24	78.63	78.9
PM10	0.96	78.63	79.6
SO2	0.08	negl.	0.1
NOx	12.65	negl.	12.7
VOC	0.70	463.11	463.8
CO	10.62	negl.	10.6
total HAPs	0.24	355.34	355.6
worst case single HAP	negl.	76.78	76.8

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

	Emissions Generating Activity		
Pollutant	Natural Gas Combustion	Surface Coating	**TOTAL**
PM	0.24	3.93	4.2
PM10	0.96	3.93	4.9
SO2	0.08	negl.	0.1
NOx	12.65	negl.	12.7
VOC	0.70	less than 97.3	less than 100
CO	10.62	negl.	10.6
total HAPs	0.24	less than 24.76	less than 25
worst case single HAP	negl.	less than 10	less than 10

Total emissions based on rated capacity at 8,760 hours/year, after enforceable control and limits.

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

Company Name: Superior Metal Technologies, LLC (formerly Aluminum Finishing Corporation)
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
FESOP renewal: F097-15522-00127
Reviewer: Seema Roy/EVP

Material (as applied)	Density (Lb/Gal)	Weight % Volatile (H20 & 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
B-1																
KY1C17839	10.6	45.00%	0.0%	45.0%	0.0%	26.00%										
as applied	10.1	56.00%	0.0%	56.0%	0.0%	26.00%	0.00400	1500.000	5.66	5.66	33.94	814.46	148.64	29.20	21.75	75%
B-2																
KY1C17839	10.6	45.00%	0.0%	45.0%	0.0%	26.00%										
as applied	10.1	56.00%	0.0%	56.0%	0.0%	26.00%	0.00400	1500.000	5.66	5.66	33.94	814.46	148.64	29.20	21.75	75%
B-5																
KW3C19694	9.7	59.00%	0.0%	59.0%	0.0%	24.00%										
as applied	9.4	67.20%	0.0%	67.2%	0.0%	24.00%	0.00200	1500.000	6.30	6.30	18.91	453.84	82.83	10.11	26.26	75%
B-6																
KW3C19694	9.7	59.00%	0.0%	59.0%	0.0%	24.00%										
as applied*	9.4	67.20%	0.0%	67.2%	0.0%	24.00%	0.00200	1500.000	**6.32**	**6.32**	**18.95**	**454.81**	**83.00**	**10.13**	**26.32**	75%
KC3C19704	9.1	72.00%	0.0%	72.0%	0.0%	39.00%										
as applied	9.3	77.60%	0.0%	77.6%	0.0%	39.00%	0.00100	1500.000	7.22	7.22	10.83	259.80	47.41	3.42	18.50	75%
Uncontrolled Potential Emissions											**105.73**	**2537.58**	**463.11**	**78.63**		
Limited Potential Emissions													**<99.3**	****3.93**		

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
As applied assumes the use of worst case diluent (glycol ether).
* Booth 6 - coatings are mutually exclusive. Worst case scenerio (in bold) used to determine potential to emit.
** Based on 95% control efficiency of dry filters.

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Superior Metal Technologies, LLC (formerly Aluminum Finishing Corporation)
Address City IN Zip: 9850 East 30th Street, Indianapolis, Indiana 46229
FESOP renewal: F097-15522-00127
Reviewer: Seema Roy/EVP

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Weight % Dimethyl phthalate	Weight % Glycol Ethers	Weight % Chromium Compounds	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Dimethyl phthalate Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Chromium Compounds Emissions (ton/yr)	Total HAP Emissions (ton/yr)
As Applied																		
B-1																		
KY1C17839	10.1	0.004000	1500.00	11.00%	8.60%	3.90%	2.60%	9.10%	11.30%	0.80%	29.20	22.83	10.35	6.90	24.15	29.99	2.12	125.55
B-2																		
KY1C17839	10.1	0.004000	1500.00	11.00%	8.60%	3.90%	2.60%	9.10%	11.30%	0.80%	29.20	22.83	10.35	6.90	24.15	29.99	2.12	125.55
B-5																		
KW3C19694	9.4	0.002000	1500.00	6.50%	7.30%	10.20%	1.50%	9.90%	6.80%	0.00%	8.03	9.02	12.60	1.85	12.23	8.40	0.00	52.12
B-6																		
KW3C19694*	9.4	0.002000	1500.00	6.50%	7.30%	10.20%	1.50%	9.90%	6.80%	0.00%	**8.03**	**9.02**	**12.60**	**1.85**	**12.23**	**8.40**	0.00	52.12
KC3C19704	9.3	0.001000	1500.00	9.50%	5.10%	11.70%	2.20%	14.00%	4.80%	0.00%	5.80	3.12	7.15	1.34	8.55	2.93	0.00	28.90
Total Uncontrolled Potential to Emit											**74.45**	**63.69**	**45.90**	**17.51**	**72.76**	**76.78**	**4.25**	**355.34**
Total Limited Potential to Emit											**<10**	**<10**	**<10**	**<10**	**<10**	**<10**	**4.25**	**<25**

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
Material usage should be limited to less than 13.43 %of potential usage based on 8760 hours per year of operation in order to limit xylene emissions to less than 10 tpy.
Material usage should be limited to less than 15.7% of potential usage based on 8760 hours per year of operation in order to limit toluene emissions to less than 10 tpy.
Material usage should be limited to less than 21.79% of potential usage based on 8760 hours per year of operation in order to limit methyl isobutyl ketone emissions to less than 10 tpy.
Material usage should be limited to less than 57.11% of potential usage based on 8760 hours per year of operation in order to limit ethyl benzene emissions to less than 10 tpy.
Material usage should be limited to less than 13.74% of potential usage based on 8760 hours per year of operation in order to limit dimethyl phthalate emissions to less than 10 tpy.
Material usage should be limited to less than 13.02% of potential usage based on 8760 hours per year of operation in order to limit glycol ether emissions to less than 10 tpy.
*Booth 6 - Coatings are mutually exclusive. Worst case coating (in bold) used to determine potential to emit.

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

Company Name: **Superior Metal Technologies, LLC (formerly Aluminum Finishing Corporation)**
Address City IN Zip: **9850 East 30th Street, Indianapolis, Indiana 46229**
FESOP renewal: **F097-15522-00127**
Reviewer: **Seema Roy/EVP**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
28.9	252.9

Facilities	**MMBtu/hr**
OV-1	3.2
TX-1	5.3
Boiler	6.3
Internal Combustion Engines	2
Misc. sources	12.07
Total	**28.87**

Miscellaneous sources include 15 space heaters, each rated at 0.1 MMBtu/hr (H1 - H15), 4 HVAC units, each rated at 0.048 MMBtu/hr (HVAC-1 - HVAC-4), 2 air make up units, one rated at 5.0 MMBtu/hr and , one rated at 3.0 MMBtu/hr (AM-1 and AM-2), 1 process tank heater, rated at 1.0 MMBtu/hr (S-10), 1 dry off oven, rated at 1.0 MMBtu/hr (OV-2), and 1 steam boiler rated at 0.382 MMBtu/hr.

	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	0.24	0.96	0.08	12.65	0.70	10.62

*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

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

Company Name: **Superior Metal Technologies, LLC (formerly Aluminum Finishing Corporation)**
Address City IN Zip: **9850 East 30th Street, Indianapolis, Indiana 46229**
FESOP renewal: **F097-15522-00127**
Reviewer: **Seema Roy/EVP**

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.656E-04	1.518E-04	9.485E-03	2.276E-01	4.300E-04

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	6.323E-05	1.391E-04	1.771E-04	4.806E-05	2.656E-04

Methodology is the same as page 4.

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