



March 17, 2005

Certified Mail: 7000 0600 0023 5187 1899

Alan R. Horner
Horner Electric
1521 East Washington Street
Indianapolis, Indiana 46201

Re: Revised Registration No. 097-16993-00301, Notice-Only
Change to Registration 097-13827-00301

Dear Mr. Horner:

Horner Electric was issued a Registration, 097-13827-00301, on September 9, 2002 for the operation of rebuilding electrical industrial apparatus for motors and generators, located at 1521 East Washington Street, Indianapolis, Indiana. On December 20, 2002, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services (OES) received a letter requesting revisions to the registration. Horner Electric requested that the record keeping requirements be removed for the VPI dip tanks, which can comply with 326 IAC 8-2-9 (Miscellaneous Metal Coatings) and do not need a limit in place make this requirement not applicable. Secondly, Horner Electric requested that the record keeping requirement to demonstrate compliance with the VOC emission limit placed on Varnish Dip Tanks, identified as EU7 and EU8, be changed. Horner Electric suggests that records should be kept of parts dipped, using the maximum usage of 0.24 pounds (lbs) of VOC per part dipped. Accordingly, the emissions limit on EU7 and EU8 should be revised to limit the number of parts corresponding to 15 pounds of VOC per day, which is 49 parts per day. Finally, Horner Electric requested that the requirements of 326 IAC 8-3-5 be removed from the permit because the source does not operate a facility of the type described in 326 IAC 8-3-1(b). IDEM, OAQ, and OES agree with these requests, which have been reflected in the registration.

On April 6, 2004, IDEM, OAQ and OES received a letter requesting that the emission statement condition be removed from the permit due to the revisions to 326 IAC 2-6 (Emission Reporting) which became effective on March 27, 2004. The Permittee is no longer required to submit an emission statement; therefore, the emission statement condition will be removed from the permit.

Changes have also been made to Condition 6 (Particulate Emissions Limitations for Manufacturing Process) to reflect the changes in the particulate emission requirements for surface coating pursuant to 326 IAC 6-3-2(e). Pursuant to 326 IAC 6-3-1(b)(5), surface coating units, EU7, EU8, EU9, and EU10 are not subject to 326 IAC 6-3 because these processes use dip coating. Emission unit, EU6, is subject to this rule because it is a spray coating operation that uses more than five (5) gallons per day. The source complies with 326 IAC 6-3-2(d) through the use of a dry particulate filter on EU-6. As of the date this permit decision is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements to EU6 until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action. The source complies with 326 IAC 6-3-2(d) through the use of a dry particulate filter on EU-6.

Department of Public Works
Office of Environmental Services
2700 South Belmont Avenue (317) 327-2234
Indianapolis, Indiana 46221 (fax) 327-2274
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Bolded language has been added, and the language with a line through it has been deleted. These are only being used in this letter to emphasize the changes made. Pursuant to the provisions of 326 IAC 2-5.5-6 the registration is hereby revised as follows:

~~2. Pursuant to the requirements of 326 IAC 2-6, the permittee shall submit an annual emission statement that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4.~~

~~The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:~~

Compliance Data Section	Office of Environmental Services
Office of Air Quality	and Air Quality Management Section, Compliance Data Group
100 North Senate Avenue	2700 South Belmont Avenue
P.O. Box 6015	Indianapolis, Indiana 46221-2097
Indianapolis, IN 46206-6015	

4.3. (a) Pursuant to 326 IAC 8-2-9(d)(2) (Miscellaneous Metal Coating), the owner or operator of varnish tanks, identified as EU9 and EU10, shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds (VOC) in excess of 3.5 pounds per gallon of coating excluding water, delivered to a coating applicator in a coating application system that is air dried. 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.

(b) Any change or modification to the facilities listed below which may increase the actuals before add-on controls shall obtain prior approval from the Office of Environmental Services (OES) and Office of Air Quality (OAQ). Current equipment operations are as follows:

~~(a)~~ (1) Paint booths identified as, (EU#6), VOC actual emissions before add on controls of less than 15 pounds of VOC including coatings, dilution solvents, and cleaning solvents per day each.

~~(b)~~ (2) Varnish Tanks, identified as (EU#7 and EU#8), VOC actual emissions before add-on controls of less than 15 pounds of VOC including coatings, dilution solvents, and cleaning solvents per day each. **This is equivalent to 49 parts per day at a maximum usage of 0.24 pounds (lbs) of VOC per part dipped.;** and

~~(c)~~ VPI Dip Tanks identified as, (EU#9 and EU#10), VOC actual emissions before add-on controls of less than 15 pounds of VOC including coatings, dilution solvents, and cleaning solvents per day each.

Compliance with this condition shall make the Miscellaneous Metal Parts Rule 326 IAC 8-2-9 not applicable **to EU6, EU7, and EU8.**

5.4. To document compliance with the above condition 3.(b), the Permittee shall maintain records in accordance with ~~(1) and (2)~~ **(a) through (c)** below. Records maintained for ~~(1) and (2)~~ **(a) through (c)** shall be taken daily and shall be complete and sufficient to establish compliance with

the VOC emission limits established in the above condition.

- ~~(1)~~(a) The weight of VOC containing material used, including purchase orders, and invoices and material safety datasheets (MSDS) necessary to verify the type and amount used;
- (b) number of parts dipped per day for EU#7 and EU#8; and
- ~~(2)~~(c) The VOC content (weight percent) of each material used.

5. Pursuant to 326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies), the allowable particulate matter emissions rate from the paint booth, identified as EU6, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:

- (a) The source shall operate the control device in accordance with the manufacturer's specifications.
- (b) If the overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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

6. Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Process) and 40 CFR 52, Subpart P, the allowable particulate emission rate from the paint booth, bakeout ovens, burnout ovens, and sandblaster shall be limited by the following:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission of 0.55 pounds per hour; and} \\ P = \text{process weight rate of less than 100 pounds/hour}$$

If the process weight rate is less than one hundred (100) pounds per hour, the allowable rate of emission is five hundred fifty-one thousandths (0.551) pound per hour.

...

~~Since the Permittee operates three small parts washers, then pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:~~

- ~~(a) Equip the degreaser with a cover. The cover must be designed so that it can be easily~~

~~operated with one (1) hand if:~~

~~(b) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF));~~

~~(c) The solvent is agitated; or~~

~~(d) The solvent is heated.~~

~~(e) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.~~

~~(f) Provide a permanent, conspicuous label which lists the above operating requirements.~~

~~(g) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.~~

~~(h) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38OC) (one hundred degrees Fahrenheit (100OF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9OC) (one hundred twenty degrees Fahrenheit (120OF)):~~

~~(1) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.~~

~~(2) A water cover when solvent is used is insoluble in, and heavier than, water.~~

~~(3) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.~~

~~8. Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility, construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:~~

~~(a) Close the cover whenever articles are not being handled in the degreaser.~~

~~(b) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.~~

~~(c) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.~~

Horner Electric
Indianapolis, IN
Permit Reviewer: Angelique Oliger

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All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised Registration.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Amanda Hennessy, (317) 327-2510.

Sincerely,

Original Signed by John B. Chavez

John B. Chavez
Administrator

aco

cc: OES Files - 2 copies
Compliance - Matt Mosier
USEPA - R5
Marion County Health Dept.
IDEM, Mindy Hahn



March 17, 2005

Mr. Alan R. Horner
Horner Electric
1521 East Washington Street
Indianapolis, Indiana 46201

Re: Revised Registration 097-16993-00301 to Registered Construction and Operation Status,
097-13827-00301

Dear Mr. Horner:

Horner Electric was issued a Registration, 097-13827-00301, on September 9, 2002 for the operation of rebuilding electrical industrial apparatus for motors and generators, located at 1521 East Washington Street, Indianapolis, Indiana. On December 20, 2002, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services (OES) received a letter requesting revisions to the registration. On April 6, 2004, IDEM, OAQ and OES received a letter requesting that the emission statement condition be removed from the Registration due to the revisions to 326 IAC 2-6 (Emission Reporting) which became effective on March 27, 2004. It has been determined that the following operation for rebuilding electrical industrial apparatus for motors and generators, to be located at 1521 East Washington Street, Indianapolis, Indiana is classified as a registered:

- (a) One (1) Paint Booth, identified as Emission Unit #6 (EU6), equipped with an air atomization spray coating gun, with a maximum capacity of 0.39 gal/hr, using dry filters as control, exhausting at one (1) stack identified as stack #3. Installed pre-1983. To be consistent with the TSD and the last modification made to the Title V permit, change Emission Unit #6 (EU6) to Emission Unit #17 (EU17)
- (b) One (1) Small Varnish Dip Tank, identified as emission unit #7 (EU7), maximum capacity of 1.0 lb/hr, exhausting at one (1) vent, identified as vent ID 7, with no control equipment, installed in 1987.
- (c) One (1) Large Varnish Dip Tank, identified as emission unit #8 (EU8), maximum capacity of 1.84 lb/hr, exhausting at one (1) vent, identified as vent ID 7, with no control equipment, installed pre-1983.
- (d) One (1) Large VPI Dip Tank, identified as emission unit #9 (EU9), maximum capacity of 2.08 lb/hr, not exhausting at a stack/vent, with no control equipment, installed in 1987.
- (e) One (1) Small VPI Dip Tank, identified as emission unit #10 (EU10), maximum capacity of 1.0 lb/hr, not exhausting at a stack/vent, with no control equipment, installed in 1996.

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- (f) One (1) Bayco Burnout Oven, identified as Emission Unit #1 (EU1), rated at less than 10 MMBtu per hour, exhausting at one (1) stack, identified as stack ID 1, with no control equipment, installed pre-1983.
- (g) One (1) Steelman Burnout Oven, identified as Emission Unit #2 (EU2), rated at less than 10 MMBtu per hour, and exhausting at one (1) stack, identified as stack ID 2, with a thermal oxidizer for control, installed in 1995.
- (h) One (1) Universal Sandblaster, identified as Emission Unit #3 (EU3) , exhausting at one (1) vent identified as vent ID 7, with a baghouse for control, installed in 1994.
- (i) One (1) Steelman Bakeout Oven, identified as Emission Unit #11 (EU11), rated at less than 10 MMBtu per hour, and exhausting at one (1) stack, identified as stack ID 4, with no control, installed pre-1983.
- (j) One (1) Despatch Bakeout Oven, identified as Emission Unit #12 (EU12), rated at less than 10 MMBtu per hour, and exhausting at one (1) stack, identified as stack ID 5, with no control, installed in 1996.
- (k) One (1) Despatch Bakeout Oven, identified as Emission Unit #13 (EU13), rated at less than 10 MMBtu per hour, and exhausting at one (1) stack, identified as stack ID 6, with no control, installed pre-1983.
- (l) Three (3) small parts washers and two (2) small paint gun cleaning units, with no control, exhausting inside the building.

The following conditions shall be applicable:

1. Pursuant to IAPCB Regulation 2 (Permits) and 326 IAC 2-5.5-4 (Registration Content), an authorized individual shall provide an annual notice to the Office of Environmental Services and the Office of Air Quality that the source is in operation and in compliance with this Registration pursuant to state regulation 326 IAC 2-5.5-4(a)(3).
2. Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), 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.
3. (a) Pursuant to 326 IAC 8-2-9(d)(2) (Miscellaneous Metal Coating), the owner or operator of varnish tanks, identified as EU9 and EU10, shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds (VOC) in excess of 3.5 pounds per gallon of coating excluding water, delivered to a coating applicator in a coating

application system that is air dried. 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.

- (b) Any change or modification to the facilities listed below which may increase the actuals before add-on controls shall obtain prior approval from the Office of Environmental Services (OES) and Office of Air Quality (OAQ). Current equipment operations are as follows:
 - (1) Paint booths identified as, (EU#6), VOC actual emissions before add on controls of less than 15 pounds of VOC including coatings, dilution solvents, and cleaning solvents per day each.
 - (2) Varnish Tanks, identified as (EU#7 and EU#8), VOC actual emissions before add-on controls of less than 15 pounds of VOC including coatings, dilution solvents, and cleaning solvents per day each. This is equivalent to 49 parts per day at a maximum usage of 0.24 pounds (lbs) of VOC per part dipped.

Compliance with this condition shall make the Miscellaneous Metal Parts Rule 326 IAC 8-2-9 not applicable to EU6, EU7, and EU8.

- 4. To document compliance with the above condition 3.(b), the Permittee shall maintain records in accordance with (a) through (c) below. Records maintained for (a) through (c) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC emission limits established in the above condition.
 - (a) The weight of VOC containing material used, including purchase orders, invoices and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (b) The number of parts dipped per day for EU#7 and EU#8; and
 - (c) The VOC content (weight percent) of each material used.
- 5. Pursuant to 326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies), the allowable particulate matter emissions rate from the paint booth, identified as EU6, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:
 - (a) The source shall operate the control device in accordance with the manufacturer's specifications.
 - (b) If the overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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

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

6. Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Process) and 40 CFR 52, Subpart P, the allowable particulate emission rate from the paint booth, bakeout ovens, burnout ovens, and sandblaster shall be limited by the following:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission of 0.55 pounds per hour; and} \\ P = \text{process weight rate of less than 100 pounds/hour}$$

If the process weight rate is less than one hundred (100) pounds per hour, the allowable rate of emission is five hundred fifty-one thousandths (0.551) pound per hour.

7. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:
 - (a) Equip the cleaner with a cover;
 - (b) Equip the cleaner with a facility for draining cleaned parts;
 - (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
 - (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (e) Provide a permanent, conspicuous label summarizing the operation requirements;
 - (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

This registration is issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality, OAQ, and the City of Indianapolis, OES, that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue**

Indianapolis, IN 46204

**and
Office of Environmental Services
Air Quality Management Section, Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) and OES if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by John B. Chavez

John B. Chavez, Administrator
Office of Environmental Services

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cc: OES Files - 2 copies
Compliance - Matt Mosier
USEPA - R5
Marion County Health Dept.
IDEM, Mindy Hahn

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

Company Name: Horner Electric
Address: 1521 East Washington Street
City: Indianapolis
Authorized individual: Mr. Alan R. Horner
Phone #: (317) 639-4261
Registration #: 097-13827-00301

I hereby certify that Horner Electric is still in operation and is in compliance with the requirements of Registration 097-13827-00301.

Name (typed):
Title:
Signature:
Date: