# FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) Renewal

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
## OFFICE OF AIR QUALITY
## and
## INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

**Geiger & Peters, Incorporated**
**761 South Sherman Drive**
**Indianapolis, Indiana 46203**

(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.: F097-17400-00135 | |
|---|---|
| Issued by: | Issuance Date: May 17, 2004 |
| John B. Chavez, Administrator<br>Office of Environmental Services | Expiration Date: May 16, 2009 |

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## SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a structural metal fabrication operation under a Standard Industrial Classification Code (SIC) of 3441 (establishments primarily engaged in fabricating iron and steel or other metals for structural purposes, such as bridges, buildings, etc.).

| | |
|---|---|
| Authorized individual: | Plant Manager |
| Source Address: | 761 South Sherman Drive, Indianapolis, Indiana 46203 |
| Mailing Address: | 761 South Sherman Drive, Indianapolis, Indiana 46203 |
| General Source Phone: | (317) 358-9521 |
| SIC Code: | 3441 |
| Source Location Status: | Marion County<br>Attainment for all criteria pollutants |
| Source Status: | Federally Enforceable State Operating Permit (FESOP)<br>Minor Source, under PSD Rules;<br>Minor Source, Section 112 of the Clean Air Act |

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

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

(a) One (1) Irvin Industries Horizontal Roller Blast machine identified as Emission Unit ID Horizontal Roller Blast Machine. Model number 100-1m-10. Maximum unit capacity of 3,900 pounds of steel shot/grit cycled per hour. Equipped with one (1) reverse flow baghouse for particulate matter control identified as Control Equipment ID CE #1 and exhausting at 8,700 acfm at Stack/Vent ID CE #1. Installation date of 1982.

(b) One (1) Graco Spray Painting Operation utilizing two (2) airless spray painting guns identified as Emission Unit ID Spray Painting. Fabricated steel beams and other miscellaneous metal parts are spray painted inside the manufacturing building and are not directly exhausted to any control equipment or Stack/Vent ID. Maximum rated capacity to apply coatings is 1.0 gallon of coating per unit and 1.5 units per hour. Installation date of 1905.

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

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

(b) Machining where an aqueous cutting coolant continuously floods the machining surface.

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

(d) Any of the following structural steel and bridge fabrication activities: Cutting 200,000 linear feet or less of one (1) inch plate or equivalent and/or using eighty (80) tons or less of welding consumables.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(f) Paved and unpaved roads and parking lots with public access.

(g) Other activities not previously identified (by category) with emissions equal to or less than Insignificant Activity thresholds: drilling holes, saw cutting, shearing, flame cutting and/or punching steel beams and plates.

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

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

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

(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;

Telephone No.: 1-800-451-6027 (ask for IDEM, OAQ, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for IDEM, OAQ, Compliance Section)
Facsimile No.: 317-233-5967

and

Telephone No.: 317-327-2234 (ask for OES Air Compliance Section)
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

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

(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

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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][IC 13-17-3-2][IC 13-17-3-2] [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, 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

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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 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.2 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.3 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.4 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.5 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.6 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.7 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

Indianapolis Office of Environmental Services
Asbestos Section
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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.8 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, and OES.

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

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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

(b) The Permittee shall notify IDEM, OAQ, and OES of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, and 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 Permittee 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.9 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.10 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.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.12 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 flow rate, 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.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval 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
Air Compliance
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within ninety (90) days from the date of issuance of this permit.

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

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

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

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, and 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 ten (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 notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response 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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, and OES within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ, 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 reserve 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.17 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 OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the OES Administrator 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.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee 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

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

(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.19 Compliance with 40 CFR 82 and 326 IAC 22-1]

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

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-8-4(10)]:** One (1) Irvin Industries Horizontal Roller Blast Machine identified as Emission Unit ID Horizontal Roller Blast Machine. Model number 100-1m-10. Maximum unit capacity of 3,900 pounds of steel shot/grit cycled per hour. Equipped with one (1) reverse flow baghouse for particulate matter control identified as Control Equipment ID CE #1 and exhausting at 8,700 acfm at Stack/Vent ID CE #1. Installation date of 1982.

(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 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations: Specified), PM emissions from Emission Unit ID Horizontal Roller Blast Machine shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

D.1.2 Particulate Matter Ten (10) Microns or Less (PM10) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 Federally Enforceable Permit Program, PM10 emissions from Emission Unit ID Horizontal Roller Blast Machine shall not exceed 0.03 grain per dry standard cubic foot of exhaust air, which is equivalent to 9.9 tons per year of PM10 emissions, based on the air flow rate of 8,760 acfm.

Limiting PM10 emissions to less than 0.03 gr/dscf is equivalent to less than 2.3 pounds of PM10 emissions per hour. Compliance with this PM10 limitation, in combination with PM10 emissions PTE from Spray Painting Operation of 19.82 ton/yr, and all Insignificant Activities PM10 PTE of 4.56 ton/yr, shall limit source wide PM10 emissions to less than the major source threshold. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.12 - Preventive Maintenance Plan, of this permit, is required for Emission Unit ID Horizontal Roller Blast Machine.

### Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(1)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM and PM-10 testing for Emission Unit ID Horizontal Roller Blast Machine utilizing methods as approved by the IDEM Commissioner. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Condition C.8 - Performance Testing.

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

D.1.5 Particulate Matter (PM)

The control equipment for PM for Emission Unit ID Horizontal Roller Blast Machine, identified as CE #1, shall be in operation at all times when Emission Unit Horizontal Roller Blast Machine is in operation.

D.1.6 Visible Emissions Notations

(a) Once per shift visible emission notations of the CE #1 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. 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.1.7 Parametric Monitoring - Pressure Readings

The Permittee shall record the total static pressure drop across the baghouse controlling the blasting machine, identified as Control Equipment ID CE #1, at least once per shift when the blasting machine is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 to 6.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

D.1.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the process when venting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. 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. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee

satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.1.10 Record Keeping Requirements

(a) To document compliance with Condition D.1.6, the Permittee shall maintain records of once per shift visible emission notations of Emission Unit ID Horizontal Roller Blast Machine stack exhaust when the blasting machine is in operation.

(b) To document compliance with Condition D.1.7, the Permittee shall maintain records of once per shift pressure readings of Control Equipment ID CE #1 when the blasting machine is in operation.

(c) To document compliance with Condition D.1.8, the Permittee shall maintain records of the results of the baghouse inspections required under Condition D.1.8.

(d) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

## SECTION D.2 FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-8-4(10)]:** One (1) Graco Spray Painting Operation utilizing two (2) airless spray painting guns identified as Emission Unit ID Spray Painting. Fabricated steel beams and other miscellaneous metal parts are spray painted inside the manufacturing building and are not directly exhausted to any control equipment or Stack/Vent ID. Maximum rated capacity to apply coatings is 1.0 gallon of coating per unit and 1.5 units per hour. Emission Unit ID Spray Painting includes the use of Hydro-Zinc, Theme-Zinc, and F.C. Typoxy coatings, used unthinned, i.e. no thinners or solvents are used in the coating. Installation date of 1905.

(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 Volatile Organic Compounds (VOCs) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings as applied to miscellaneous metal parts, including maintenance spray painting of production equipment, shall be limited to 3.5 pounds of VOCs per gallon of coating less water for air dried or forced warm air dried coatings.

D.2.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

The hazardous air pollutant (HAP) emissions shall be limited as follows:

(a) Usage of coating shall be limited such that per 12 consecutive months, with compliance determined at the end of each month, less than 10 tons of a single HAP is delivered to the applicator.

(b) Any combination of HAPs delivered to the applicator shall be less than twenty-five (25) tons per twelve (12) consecutive month period.

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

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.12 - Preventive Maintenance Plan, of this permit, is required for this facility.

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

D.2.4 Monitoring

Should overspray emissions from Emission Unit ID Spray Painting be directed to the outside air:

(a) Weekly observations shall be made of the overspray from surface coating stack exhaust while surface coating is in operation, should emissions be directed to the outside stack. 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 Condition C.15 - 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/or 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 Condition C.15 - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

D.2.5 Volatile Organic Compound (VOC) Content and Usage

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.2.1.

(1) The type, amount, and VOC content of each coating material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) A log of the dates of use;

(3) The VOC content of the coatings used, as applied, for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.2.4, the Permittee shall maintain a log of weekly overspray observations, monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

D.2.6 Hazardous Air Pollutants (HAPs)

(a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP(s) emission limit(s) established in Condition D.2.2.

(1) The amount and HAP content of each coating material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) A log of the dates of use;

(3) The HAP content (weight percent) of each material used;

(4) The weight of HAPs emitted for each calendar month, considering capture and control efficiency, if applicable;

(5) Identification of the facility or facilities associated with the usage of each HAP.

(b) All records shall be maintained in accordance with Section C.18 - General Record Keeping Requirements, of this permit.

D.2.7 Recordkeeping and Reporting Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of weekly observations of the overspray from surface coating stack exhaust while surface coating is in

operation, should emissions be directed to the outside stack.

(b) To document compliance with Condition D.2.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(c) A quarterly summary to document compliance with operation condition D.2.2 - Hazardous Air Pollutants, shall be submitted to the address(es) listed in Condition C.19 - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported.

## SECTION D.3 FACILITY OPERATION CONDITIONS

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

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

(b) Machining where an aqueous cutting coolant continuously floods the machining surface.

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

(d) Any of the following structural steel and bridge fabrication activities: Cutting 200,000 linear feet or less of one (1) inch plate or equivalent and/or using eighty (80) tons or less of welding consumables.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(f) Paved and unpaved roads and parking lots with public access.

(g) Other activities not previously identified (by category) with emissions equal to or less than Insignificant Activity thresholds: drilling holes, saw cutting, shearing, flame cutting and/or punching steel beams and plates.

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

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

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations: Specified), PM emissions from insignificant activities shall not exceed 0.03 per dry standard cubic foot of exhaust air.

# 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: Geiger & Peters, Incorporated
Source Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
Mailing Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
FESOP No.: F097-17400-00135

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

Please check what document is being certified:

Annual Compliance Certification Letter

Test Result (specify) _____

Report (specify) _____

Notification (specify) _____

Affidavit (specify) _____

Other (specify) _____

| |
|---|
| I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.<br><br>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**
## OFFICE OF ENVIRONMENTAL SERVICES
**COMPLIANCE**
**2700 South Belmont Avenue**
**Indianapolis, Indiana 46221**
**Phone: 317-327-2234**
**FAX:317-327-2274**

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

Source Name: Geiger & Peters, Incorporated
Source Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
Mailing Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
FESOP No.: F097-17400-00135

**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<br>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 Usage Report

(Submit Report Quarterly)

Source Name: Geiger & Peters, Incorporated
Source Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
Mailing Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
FESOP No.: F097-17400-00135
Facility: **Emission Unit ID Spray Painting**
Parameter: Monthly rolling HAP Emissions
Limit: Less than 10 tons single HAP per 12 consecutive month period and less than 25 tons of any combination of HAPs emissions per 12 consecutive month period.

**Quarter _____ Year _____**

**Highest Single HAP Emissions in Tons per 12 Consecutive Month Period**

| Month # | Column 1 | Column 2 | Column 1 + Column 2 |
|---|---|---|---|
| | This Month | Previous 11 Months | 12 Month Total |
| Month | | | |
| Month | | | |
| Month | | | |

**Any Combination Sum of HAPs Emissions per 12 Consecutive Month Period**

| Month # | Column 1 | Column 2 | Column 1 + Column 2 |
|---|---|---|---|
| | This Month | Previous 11 Months | 12 Month Total |
| Month | | | |
| Month | | | |
| Month | | | |

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MAN AGEMENT**
**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: Geiger & Peters, Incorporated
Source Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
Mailing Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
FESOP No.: F097-17400-00135

**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". |
| NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. |
| 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:** | |

| | |
|---|---|
| **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
# INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

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

### Source Background and Description

| | |
|---|---|
| **Source Name:** | **Geiger & Peters, Inc.** |
| **Source Location:** | **761 South Sherman Drive, Indianapolis, Indiana 46203** |
| **County:** | **Marion** |
| **SIC Code:** | **3441** |
| **Operation Permit No.:** | **F097-17400-00135** |
| **Permit Reviewer:** | **B. Gorlin** |

The Office of Environmental Services (OES) has reviewed a Federally Enforceable State Operating Permit (FESOP) renewal application from Geiger & Peters, Inc. relating to a structural metal fabrication operation under a Standard Industrial Classification Code (SIC) of 3441 (establishments primarily engaged in the fabrication of iron and steel or other metal products for structural purposes such as bridges, buildings, etc.). Geiger & Peters, Inc. was issued FESOP 097-9690-00135 on August 3, 1999.

**Permitted Emission Units and Pollution Control Equipment**

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

(a) One (1) Irvin Industries Horizontal Roller Blast machine identified as Emission Unit ID Horizontal Roller Blast Machine. Model number 100-1m-10. Maximum unit capacity of 3900 pounds of steel shot/grit cycled per hour. Equipped with one (1) reverse flow baghouse for particulate matter control identified as Control Equipment ID CE #1 and exhausting at 8700 acfm at Stack/Vent ID CE #1. Installation date of 1982.

(b) One (1) Graco Spray Painting Operation utilizing two (2) airless spray painting guns identified as Emission Unit ID Spray Painting. Fabricated steel beams and other miscellaneous metal parts are spray painted inside the manufacturing building and are not directly exhausted to any control equipment or Stack/Vent. Maximum rated capacity to apply coatings is 1.0 gallon of coating per unit and 1.5 units per hour. Emission Unit ID Spray Painting includes the use of Hydro-Zinc, Theme-Zinc, and F.C. Typoxy coatings, used unthinned, i.e. no thinners or solvents are used to the coating. Installation date of 1905.

**Unpermitted Emission Units and Pollution Control Equipment**

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

**Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

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

(b) Machining where an aqueous cutting coolant continuously floods the machining surface;

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

(d) Any of the following structural steel and bridge fabrication activities: Cutting 200,000 linear feet or less of one (1) inch plate or equivalent and/or using eighty (80) tons or less of welding consumables;

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

(f) Paved and unpaved roads and parking lots with public access;

(g) Other activities not previously identified (by category) with emissions equal to or less than Insignificant Activity thresholds: drilling holes, saw cutting, shearing, flame cutting and/or punching steel beams and plates.

**Existing Approvals**

This source has been operating under the following approvals:

(1) FESOP F097-9690-00135, issued on August 3, 1999;

(2) F 097-13080-00135, Permit Reopening to change the language of Permit Condition B.12 (Annual Compliance Certification) [326 IAC 2-8-5)a)(1)], issued on September 27, 2001.

**Enforcement Issue**

There are no Enforcement actions pending.

**Recommendation**

The staff recommends to the Administrator 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 June 9, 2003.

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

**Emissions Calculations**

See Appendix A: Emissions Calculations for detailed calculations (pages 1 through 5 of 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 | Potential Emissions (tons/year) |
|---|---|
| PM | 202.4 |
| PM-10 | 149.3 |
| $SO_2$ | 0.0 |
| VOC | 19.84 |
| CO | 0.0 |
| $NO_x$ | 0.0 |

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

| HAP | Potential Emissions (tons/year) |
|---|---|
| Xylene (worst case) | 15.28 |
| Ethyl Benzene | 3.48 |
| TOTAL (worst case) | 17.43 |

(a) The unrestricted potential emissions of particulate matter less than ten (10) microns (PM10) 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 is equal to or greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

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

**Potential to Emit After Issuance**

(a) The source has opted to remain a FESOP source. The table below summarized the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP 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.

(a) The source has accepted a federally enforceable limit on potential to emit PM10 of less than 100 tons per year, consisting of:

(i) less than 95.4 tons per year for the significant activities, and

(ii) less than 4.6 tons per year for the insignificant activities.

(b) The source has accepted a limit on potential to emit of less than 10.0 tons per year for any single HAP and less than 25.0 tons per year for any combination of HAPs.

(c) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

| | Limited Potential to Emit (tons/year) | | | | | | |
|---|---|---|---|---|---|---|---|
| Process/ facility | PM | PM-10 | $SO_2$ | VOC | CO | $NO_X$ | HAPs |
| **Emission Unit ID** Horizontal Roller Blast Machine | See below * | See below * | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| **Emission Unit ID** Spray Painting | See below * | See below * | 0.0 | 19.84 | 0.0 | 0.0 | <10.0 / 25.0 |
| Insignificant Activities | 4.56 | 4.56 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Total Emissions | See below * | <100.0 | 0.0 | 13.0 | 0.0 | 0.0 | <10.0 / 25.0 |

* denotes that significant emission units + insignificant activities are limited to less than the major source threshold for PM and PM10.

**County Attainment Status**

The source is located in Marion County.

| Pollutant | Status |
|---|---|
| PM-10 | attainment |
| $SO_2$ | maintenance |
| $NO_2$ | attainment |
| Ozone | maintenance |
| CO | maintenance |
| 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 attainment or unclassifiable 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 or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for

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

**Source Status**

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

| Pollutant | Emissions (ton/yr) |
|---|---|
| PM | <100 |
| PM10 | <100 |
| $SO_2$ | 0 |
| VOC | 19.84 |
| CO | negligible |
| $NO_x$ | negligible |

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

**Federal Rule Applicability**

(a) This structural metal fabrication operation does not fall under any of categories under 40 CFR 60, Subparts EE (Surface Coating of Metal Furniture), MM (Automobile and Light Duty Truck Surface Coating Operations), SS (Industrial Surface Coating: Large Appliances), or TT (Metal Coil Surface Coating). There are no other New Source Performance Standards (NSPS, 326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) This source falls under a category regulated by the MACT standard 40 CFR 63, Subpart MMMM as a source of miscellaneous metal parts and products surface coating operations. Subpart MMMM was promulgated (signed by the EPA Acting Administrator) in August, 2003. The final compliance date for existing sources is three (3) years from the final rule publication date in the Federal Register. This existing source is limited to HAP emissions less ten (10) tons per year of a single HAP and twenty-five (25) tons per year of a combination of HAPs. Therefore, the source is not a major HAP source and is not subject to the requirements of 40 CFR 63, Subpart MMMM (National Emission Standards for Miscellaneous Metal Parts and Products Surface Coating Operations), is not affected by Clean Air Act Section 112j, and is not required to submit a Part I MACT Application.

**State Rule Applicability - Entire Source**

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

OES has verified that the source has Preventive Maintenance Plan (PMP) which fulfills 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. Emission Unit ID Horizontal Roller Blast Machine has uncontrolled potential emissions of PM in excess of 25.0 tons per year (see Appendix A, Page 2 of 4). With the use of a baghouse at an estimated 98% PM control

efficiency, actual emissions at maximum capacity and 8,760 hours of operation are less than 25.0 tons per year. 326 IAC 1-7-5 specifically exempts sources from the GEP stack height requirement if actual emissions (after controls) are less than 25 tons per year. Therefore, requirements of 326 IAC 1-7 shall not apply.

326 IAC 2-2 (Prevention of Significant Deterioration)

The requirements of 326 IAC 2-2 do not apply to this source because the potential to emit before controls of criteria pollutants are less than the threshold levels for applicability of the rule (250 tons per year), the source was built in 1905, and is not one of 28 listed source categories under 326 IAC 2-2.

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

The Spray Painting operation utilizing two (2) airless spray painting guns, identified ad EU ID Spray Painting, was constructed in 1905; therefore, rule 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source, operating under a FESOP, is not required to obtain an operating permit under 326 IAC 2-7, Part 70 Permit Program; therefore, pursuant to 326 IAC 2-6-1(a)(1), it is not subject to the requirements of the Emission Reporting rule 326 IAC 2-6.

326 IAC 2-8 (Federally Enforceable State Operating Permit Program (FESOP))

Pursuant to 326 IAC 2-8 and F097-9690-00135, issued on March 8, 1999, the following PM10 and HAP limitations apply:

(a) PM10 emissions shall be limited to less than 100 tons per year, consisting of less than 75.62 tons per year for the Horizontal Roller Blast Machine, Spray Painting Operation PM10 potential emissions of 19.82 ton/yr and all the Insignificant Activities PM10 potential emissions of 4.56 ton/yr (see Emissions Calculations Summary - Appendix A, page 5 of 5).

(b) PTE to emit any single HAP or any combination of HAP exceeds the major source thresholds for HAPs. Pursuant to 326 IAC 2-8 and F097-9690-00135, issued on August 3, 1999, any single HAP emissions are limited to less than 10 tons per rolling twelve (12) consecutive month period and combined HAPs emissions are limited to less than tons per twelve (12) consecutive month period. Therefore, PTE is enforceably restricted to less than the major source threshold and the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.

These limits render requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

326 IAC 5-1 (Opacity Limitations)

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

(a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1-2 (Nonattainment Area Particulate Limitations: Specified)

This source is not specifically listed in sections 8.1 through 18 of 326 IAC 6-1 (Particulate Rules. Nonattainment Area Limitations), but has the potential to emit one hundred (100) tons or more of particulate matter per year, and is located in Marion County; therefore, it is subject to 326 IAC 6-1-2.

**State Rule Applicability - Individual Facilities**

326 IAC 6-1-2 (Nonattainment Area Particulate Limitations: Specified)

Pursuant to 326 IAC 6-1-2, Horizontal Roller Blast Machine PM emissions are limited to 0.03 gr/dscf, which is equivalent to 9.8 tons per year, based on control equipment air flow rate of 8,760 acfm. Calculated actual controlled PM emissions from the Horizontal Roller Blast Machine equate to 0.011 gr/dscf (see TSD Appendix A, page 2 of 4). Therefore, PM/PM10 PTE, in combination with the Spay Painting Operation potential emissions of 19.82 ton/yr, and all the Insignificant Activities emissions of 4.56 ton/yr, is enforceably restricted to less than the major source threshold, such that the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.

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

This source has an SIC of 3441 and surface coats miscellaneous metal parts in Marion County. The 326 IAC 8-2-9 is an applicable requirement because actual VOC emissions exceed fifteen (15) pounds per day. Pursuant to 326 IAC 8-2-9, the volatile organic compound (VOC) content of coating(s) applied in Emission Unit ID Spray Painting shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried or forced warm air dried coatings up to 194 degrees Fahrenheit. The facility is not presently equipped with a drying oven or drying equipment and all coatings are 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.

Based on the MSDS submitted by the company and calculations made (see TSD Appendix A page 1 of 4), spray painting operations appear to be in compliance with this requirement.

**Compliance Determination Requirements**

326 IAC 2-8-5(1) (Testing Requirements)

(a) During the period between 30 and 36 months after issuance of this FESOP the Permittee shall perform PM and PM-10 testing for Emission Unit ID Horizontal Roller Blast Machine utilizing methods as approved by the IDEM Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Condition C.8 - Performance Testing.

(b) Stack testing of this Spray Painting Operation is not required because it does not have an air control device, VOC is not a “major” pollutant (worst case VOC PTE is 19.84 tpy), PM/PM10 unrestricted PTE (worst case) is 19.82 tpy, less than 40% of the total source PTE before control. In addition, there is no forced draft aspiration system present at this emission unit to direct emissions to outside air. However, IDEM, OAQ, and/or OES may require compliance testing at any specific time when necessary to determine if the facility is in compliance.

**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, 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:

Emission Unit ID Horizontal Roller Blast Machine has applicable compliance monitoring conditions as specified below:

The control equipment for PM for Emission Unit ID Horizontal Roller Blast Machine, identified as CE # 1, shall be in operation at all times when Emission Unit Horizontal Roller Blast Machine is in operation.

(a) Once per shift visible emission notations of the Emission Unit ID Horizontal Roller Blast Machine stack exhaust(s) shall be performed during normal daylight operations when the blasting machine is in operation. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

The Permittee shall record the total static pressure drop across the baghouse controlling the blasting machine, identified as Control Equipment ID CE #1, at least once per shift when the blasting machine is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 1.0 to 6.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

Baghouse Inspections
An inspection shall be performed each calendar quarter of all bags controlling the process when

venting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. 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. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ, and OES of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouse for the blasting machine must operate properly to ensure compliance with 326 IAC 6-1-2 (Particulate Limitations) and 326 IAC 2-8 (FESOP).

Emission Unit ID Spray Painting has applicable compliance monitoring conditions as specified below:

Should overspray emissions from Emission Unit ID Spray Painting be directed to the outside air:

(a) Daily observations shall be made of the overspray from surface coating stack exhaust while surface coating is in operation, should emissions be directed to the outside stack. 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 Condition C.15 - 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/or 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 Condition C.15 - 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.

These monitoring conditions are necessary because the spray painting operation must ensure compliance with 326 IAC 6-1-2 (Particulate Limitations) and 326 IAC 2-8 (FESOP).

**Conclusion**

The operation of this structural metal fabrication operation shall be subject to the conditions of the attached proposed FESOP No.: F097-17400-00135.

# Indiana Department of Environmental Management
# Office of Air Quality
# and
# Indianapolis Office of Environmental Services

## Addendum to the
## Technical Support Document (TSD) for a FESOP Renewal

**Source Name:** **Geiger & Peters, Inc.**
**Source Location:** **761 South Sherman Drive, Indianapolis, Indiana 46203**
**County:** **Marion**
**SIC Code:** **3441**
**Operation Permit No.:** **F097-17400-00135**
**Permit Reviewer:** **B. Gorlin**

On April 12, 2004, the Indianapolis Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that on June 9, 2003, Geiger & Peters, Inc. located at 761 South Sherman Drive, Indianapolis, Indiana 46203, applied for the renewal of a Federally Enforceable State Operating Permit (FESOP). The notice also stated that the OES proposed to issue a FESOP Renewal for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The TSD will remain as it originally appeared when published. Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and OES prefer that the Technical Support Document reflects the permit that was on public notice. Changes to the permit or technical support material that occur after the permit has been published are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision (bolded language has been added, the language with a line through it has been deleted). The Table of Contents and conditions numbering have been revised, as needed.

Written comments were received from the Applicant, Geiger & Peters, Inc., on May 7, 2004. These comments and OES responses, including changes to the permit, are as follows.

**Comment 1:**

Section A.2 (b) and Section D.2.2 (a) stipulate which particular coatings are approved for use. Since Geiger and Peters is a job shop, they require flexibility in the coatings that they use. Please remove all references to specific coatings, requiring only that the coatings contain less than or equal to 3.5 pounds of VOCs per gallon of coating less water and that the HAP emission limits are met as required. Please amend section A.2 (b) and Section D.2.2 (a) respectively to the following:

> One (1) Graco Spray Painting Operation utilizing two (2) airless spray painting guns identified as Emission Unit ID Spray Painting. Fabrication steel beams and other miscellaneous metals parts are spray painted inside the manufacturing building and are not directly exhausted to any control equipment or Stack / Vent ID. Maximum rated capacity is 1.0 gallon of coating per unit and 1.5 units per hour. Installation date of 1905.
>
> The hazardous air pollutant (HAP) emission shall be limited as follows:
>
> Usage of coating shall be limited such that per 12 consecutive months, with compliance determined at the end of each moth, less than 10 tons of a single HAP is delivered to the applicator. Any combination of HAPs delivered to the applicator shall be less than twenty-five tons per twelve (12) consecutive month period.

**Response 1:**

The following changes were made to the Condition A.2 (Emission Units and Pollution Control Equipment Summary) and D.2.2 (Hazardous Air Pollutants (HAPs)

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

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

(a) One (1) Irvin Industries Horizontal Roller Blast machine identified as Emission Unit ID Horizontal Roller Blast Machine. Model number 100-1m-10. Maximum unit capacity of 3,900 pounds of steel shot/grit cycled per hour. Equipped with one (1) reverse flow baghouse for particulate matter control identified as Control Equipment ID CE #1 and exhausting at 8,700 acfm at Stack/Vent ID CE #1. Installation date of 1982.

(b) One (1) Graco Spray Painting Operation utilizing two (2) airless spray painting guns identified as Emission Unit ID Spray Painting. Fabricated steel beams and other miscellaneous metal parts are spray painted inside the manufacturing building and are not directly exhausted to any control equipment or Stack/Vent ID. Maximum rated capacity to apply coatings is 1.0 gallon of coating per unit and 1.5 units per hour. ~~Emission Unit ID Spray Painting includes the use of Hydro-Zinc, Theme-Zinc, and F.C. Typoxy coatings, used unthinned, i.e. no thinners or solvents are used in the coating.~~ Installation date of 1905.

D.2.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

The hazardous air pollutant (HAP) emissions shall be limited as follows:

(a) Usage of coating ~~F.C. Typoxy~~ shall be limited **such that per 12 consecutive months, with compliance determined at the end of each month, less than 10 tons of a single HAP is delivered to the applicator.** ~~to less than 8,601 gallons per 12 consecutive months, with compliance determined at the end of each month, which is equivalent to less than 10 tons of a single hazardous air pollutant (HAP) (Xylene) delivered to the applicator. For purposes of determining compliance based on a single HAP emission:~~

~~(1) Each gallon of Hydro-Zinc coating shall be equivalent to 0.904 gallons of F.C. Typoxy;~~

~~(2) Each gallon of Tneme-Zinc coating shall be equivalent to 0.913 gallons of F.C. Typoxy.~~

(b) Any combination of HAPs delivered to the applicator shall be less than twenty five (25) tons per twelve (12) consecutive month period.

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

**Comment 2:**

Section C.12 (c) requires that calibration methods be included in a Preventive Maintenance Plan for the facilities pH meter. Geiger and Peters does not have a pH meter. Please remove this section.

**Response 2:**

The following changes were made to the Condition C.12:

C.12 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 flow rate, 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 Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.~~

~~(d)~~**(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.

**Comment 3:**

Section D.1.4 requires PM and PM10 testing of the blast machine, to be repeated every five years. If the performance testing demonstrates compliance with the emission limits, we propose allowing the testing to be a one-time event and not require repeating the test. Please amend this section to the following:

During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Conditions D.1.1 and D.1.2 the Permittee shall perform PM and PM10 testing for Emission Unit ID Horizontal Roller Blast Machine utilizing methods as approved by the IDEM Commissioner. PM10 includes filterable and condensible PM10. Testing shall be conducted in accordance with Condition C.8 – Performance Testing.

**Response 3:**

The following changes were made to the Condition D.1.4 (Testing Requirements):

D.1.4 Testing Requirements [326 IAC 2-8-5(1)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM and PM-10 testing for Emission Unit ID Horizontal Roller Blast Machine utilizing methods as approved by the IDEM Commissioner. ~~This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration.~~ PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Condition C.8 - Performance Testing.

# Appendix A: Emission Calculations

**Company Name:** Geiger & Peters, Inc.
**Address City IN Zip:** 761 South Sherman Drive, Indianapolis, Indiana 46203
**Plt ID:** 097-00135
**Permit #:** 097-17400-00135
**Reviewer:** Boris Gorlin

## Coatings Properties

**Hydro zinc 91-H2O**

As per the MSDS provided by the manufacturer (Tnemec), the Hydro-Zinc 91-H20 has an unthinned VOC content of 2.67 lbs/gallon.
As per the MSDS provided by the manufacturer (Tnemec), the Hydro-Zinc 91-H20 has an unthinned solids content of 63%.
As per the MSDS provided by the manufacturer (Tnemec), the Hydro-Zinc 91-H20 weighs 23.94 lbs per gallons as applied.
As applied:
**2.67** pounds of VOC per gallon
mixture

| F091-0H20A | | F091-0H20B | |
|---|---|---|---|
| 9.1213 | lbs/gal | 58.7993 | lbs/gal |

Mixed in a 3:1 ratio
Part A contains:
Ethyl benzene
8.22% weight percent of part A
Xylene
32.91% weight percent of part A
As applied:
Ethyl benzene = (% Ethyl benzene of part A x 9.1213 lb/gal) * 2.8 gallons of part A makes 4 gallons as applied
= **0.52** lbs of ethyl benzene / gallon
Xylene = (% Xylene of part A x 9.1213 lb/gal) * 2.8 gallons of part A makes 4 gallons as applied
= **2.10** lbs of xylene / gallon
PTE PM Emissions: (80% transfer efficiency)
23.94 lbs/gal
63% solids
15.0822 lbs of solids / gallon
4.52466 lbs PM / hour
19.8180108 tons PM / year

**Tneme-Zinc 90-97**

As per the MSDS provided by the manufacturer (Tnemec), the Tneme-Zinc 90-97 has an unthinned VOC content of 2.67 lbs/gallon.
As per the MSDS provided by the manufacturer (Tnemec), the Tneme-Zinc 90-97 has an unthinned solids content of 63%.

As per the MSDS provided by the manufacturer (Tnemec), the Tneme-Zinc 90-97 weighs 23.94 lbs per gallon.

As applied:
**2.67** pounds of VOC per gallon
To calculate the HAP content of Tneme Zinc 90-97 a mass balance is performed using the HAP content of the two component mixture

| F090-0097A | | F090-0097B | |
|---|---|---|---|
| 8.9615 | lbs/gal | 58.7993 | lbs/gal |
| 3.793 | lbs VOC per gal | 0 | lbs VOC per gal |
| 42.328 | % VOC by weight | 0 | % VOC by weight |

Mixed in a 3:1 ratio
Part A contains:
Ethyl benzene
8.45% weight percent of part A
Xylene
33.84% weight percent of part A
As applied:
Ethyl benzene = (% Ethyl benzene of part A x 8.9615 lb/gal) * 2.8 gallons of part makes 4 gallons as applied
= **0.53** lbs of ethyl benzene / gallon
Xylene = (% Xylene of part A x 8.9615 lb/gal) * 2.8 gallons of part A makes 4 gallons as applied
= **2.12** lbs of xylene / gallon
PTE PM emissions: (80% transfer efficiency)
23.94 lbs/gallon
63% solids
15.0822 lbs of solids / gallon
4.52466 lbs PM / hour
19.8180108 tons PM / year

**F.C. Typoxy**

As per the MSDS provided by the manufacturer (Tnemec), the F.C. Typoxy has an unthinned VOC content of 3.02 lbs/gallon.
As applied:
**3.02** pounds of VOC per gallon
To calculate the HAP content of F.C. Typoxy a mass balance is performed using the HAP content of the two component mixture

| F027-11WHA | | F027-0027B | |
|---|---|---|---|
| 14.5885 | lbs/gal | 12.7603 | lbs/gal |

Mixed in a 1:1 ratio

| Part A contains: | | Part B contains: | |
|---|---|---|---|
| Xylene | | Ethyl benzene | |
| 14.35% | weight percent of part A | 3.23% | weight percent of part B |
| | | Xylene | |
| | | 20.04% | weight percent of part B |

As applied:
Ethyl benzene = (% Ethyl benzene of part B x 12.7603 lb/gal) * 1 parts B / 2 total parts
= **0.21** lbs of ethyl benzene / gallon
Xylene = [(% Xylene of part A x 14.5885 lb/gal) x 1 part A + (% Ethyl benzene of part B x 12.7603 lb/gal) x 1 part B] / 2 total parts
= **2.33** lbs of xylene / gallon
PTE PM emissions: (80% transfer efficiency)
13.71 lbs/gallon
58% solids
7.9518 lbs of solids / gallon
2.38554 lbs PM / hour
10.4486652 tons PM / year

# Appendix A: Emission Calculations

**Company Name:** Geiger & Peters, Inc.
**Address City IN Zip:** 761 South Sherman Drive, Indianapolis, Indiana 46203
**Plt ID:** 097-00135
**Permit #:** 097-17400-00135
**Reviewer:** Boris Gorlin

## Spray Painting PTE (as supplied)

**Max capacity stated as:**

**1 gallon per unit (ton)**
**1.5 units (tons) / hr**
**80 % Transfer Efficiency**

## Potential VOC Emissions (worst case)

| Coating | lbs volatile/gal coat | lbs / hr VOC PTE and actual | tons / yr VOC PTE | Actual tons / yr VOC |
|---|---|---|---|---|
| Hydro zinc | 2.67 | 4.01 | **17.54** | 5.00 |
| Tneme-Zinc | 2.67 | 4.01 | **17.54** | 5.00 |
| **F.C. Typoxy** | 3.02 | 4.53 | **19.84** | 5.65 |

## PM/PM10 Emissions

| Coating | lbs solid / gal coat | lb / hr PM PTE and actual | tons / yr PM PTE | Actual tons / yr PM |
|---|---|---|---|---|
| Hydro zinc | 15.082 | 4.525 | **19.818** | 5.647 |
| Tneme-Zinc | 15.082 | 4.525 | **19.818** | 5.647 |
| F.C. Typoxy | 7.952 | 2.386 | **10.449** | 2.977 |

## Potential HAP Emissions (worst case)

| Coating | Maximum Usage | Ethyl benzene | Xylene | lbs /hr Ethyl benzene | lbs / hr Xylene | lbs / hr combined HAPs | tons / yr Ethyl benzene PTE | tons / yr Xylene PTE | tons / yr combined HAPs |
|---|---|---|---|---|---|---|---|---|---|
| | gal/yr | lbs / gallon | lbs / gallon | | | | | | |
| Hydro zinc | 13,140 | 0.52 | 2.10 | 0.79 | 3.15 | 3.94 | 3.45 | **13.81** | 17.25 |
| Tneme-Zinc | 13,140 | 0.53 | 2.12 | 0.80 | 3.18 | **3.98** | 3.48 | **13.95** | **17.43** |
| F.C. Typoxy | 13,140 | 0.21 | 2.33 | 0.31 | **3.49** | 3.80 | 1.35 | **15.28** | 16.63 |

## Note:

Painting is conducted for **one shift per day**, **six days per week**.
The coating systems are used unthinned, i.e. **no thinner or solvent is added to the coating**.

## Limited HAP (worst case - Xylene) Emissions:

| | | | | | Emissions at limited coatings usage, ton/yr | | |
|---|---|---|---|---|---|---|---|
| | Limited **Xylene** Emission, less than ton/yr | Xylene Content, lb/gal | Limited usage, less than, gal/yr | Equivalency to F.C. Typoxy, gal/gal | **VOC Emissions, less than** | **Combined HAP Emissions, less than** | **PM/PM10** |
| Hydro zinc | **10** | 2.10 | **9,518** | **0.904** | **12.7** | **12.498** | **14.4** |
| Tneme-Zinc | **10** | 2.12 | **9,422** | **0.913** | **12.6** | **12.497** | **14.2** |
| F.C. Typoxy | **10** | 2.33 | **8,601** | **1** | **13.0** | **10.886** | **6.8** |

# Appendix A: Emission Calculations

## Abrasive Blasting - Horizontal Roller Blast Machine

| | |
|---|---|
| **Company Name:** | **Geiger & Peters, Inc.** |
| **Address City IN Zip:** | **761 South Sherman Drive, Indianapolis, Indiana 46203** |
| **Plt ID:** | **097-00135** |
| **Permit #:** | **097-17400-00135** |
| **Reviewer:** | **Boris Gorlin** |

***Table 1 - Emission Factors for Abrasives***

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

***Table 2 - Density of Abrasives (lb/ft3)***

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

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

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

| | Nozzle Pressure (psig) | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| Internal diamete | 30 | 40 | 50 | 60 | 70 | 80 | 90 | 100 |
| 1/8 | 28 | 35 | 42 | 49 | 55 | 63 | 70 | 77 |
| 3/16 | 65 | 80 | 94 | 107 | 122 | 135 | 149 | 165 |
| 1/4 | 109 | 138 | 168 | 195 | 221 | 255 | 280 | 309 |
| 5/16 | 205 | 247 | 292 | 354 | 377 | 420 | 462 | 507 |
| 3/8 | 285 | 355 | 417 | 477 | 540 | 600 | 657 | 720 |
| 7/16 | 385 | 472 | 560 | 645 | 755 | 820 | 905 | 940 |
| 1/2 | 503 | 615 | 725 | 835 | 945 | 1050 | 1160 | 1265 |
| 5/8 | 820 | 990 | 1,170 | 1,336 | 1510 | 1680 | 1850 | 2030 |
| 3/4 | 1140 | 1420 | 1,670 | 1,915 | 2160 | 2400 | 2630 | 2880 |
| 1 | 2030 | 2460 | 2,900 | 3,340 | 3780 | 4200 | 4640 | 5060 |

**Calculations**

*Adjusting Flow Rates for Different Abrasives and Nozzle Diameters*

| | |
|---|---|
| Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID) | |
| FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 = | NA |
| D = Density of abrasive (lb/ft3) From Table 2 = | NA |
| D1 = Density of sand (lb/ft3) = | NA |
| ID = Actual nozzle internal diameter (in) = | NA |
| ID1 = Nozzle internal diameter (in) from Table 3 = | NA |
| **Flow Rate (FR) (lb/hr) =** | **3900.0** * per nozzle |

**Uncontrolled Emissions (E, lb/hr)**

| | |
|---|---|
| EF = emission factor (lb PM/ lb abrasive) From Application of 3/16/98 * = | 0.01036 |
| FR = Flow Rate (lb/hr) From Application of 3/16/98 *= | 3900.000 |
| w = fraction of time of wet blasting = | 0 % |
| N = number of nozzles = | 1 |
| EF = emission factor (lb PM 10/ lb abrasive) From Table 1 for Grit = | 0.70000 |

| | | | | | |
|---|---|---|---|---|---|
| **Uncontrolled PM Emissions =** | **40.4** | **lb/hr** | **Uncontrolled PM 10 Emissions =** | **28.3** | **lb/hr** |
| | **177.0** | **ton/yr** | | **123.9** | **ton/yr** |

Estimated Actual Emissions based on 8 hr/day, 6 days/week

Estimated Actual Emissions based on 98% baghouse efficiency & 8760 hr

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| **Uncontrolled actual PM Emissions =** | **40.4** | **lb/hr** | **Controlled PM Emissions =** | **0.8** | **lb/hr** | **0.011** | **gr/dscf** |
| | **50.4** | **ton/yr** | | **3.5** | **ton/yr** | | |

**METHODOLOGY**

Emission Factors from Stappa Alapco, Section 3 "Abrasive Blasting"

@ 0.03gr/dscf & 8700 acfm:

| | | | | | | |
|---|---|---|---|---|---|---|
| Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs | **Controlled PM10 Emissions =** | **0.6** | **lb/hr** | **2.3** | **lb/hr** |
| Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1) | | **2.5** | **ton/yr** | **9.9** | **tons/yr** |

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

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

* denotes source supplied the flow rate of steel shot/grit in the application received 3/16/98. Source also reported inlet dust concentration of 4714 grains/min.

4714 grains/min * lb/7000 grains x 60 min/hr = 40.4 lbs/hr of emissions uncontrolled.

40.4 lbs/hr / 3900 lbs shot cycled/hr = 0.01036 lbs PM emissions per pound of shot which is in line with Table 1 data.

**Appendix A: Emission Calculations**
**Insignificant Activities PTE**

| max tons/yr of welding consumables: |
|---|
| 80 |

**Company Name:** Geiger & Peters, Inc.
**Address City IN Zip:** 761 South Sherman Drive, Indianapolis, Indiana 46203
**Plt ID:** F097-00135

| nsignificant Activity | PTE | | Actual | |
|---|---|---|---|---|
| | PM tons/yr | PM10 tons/yr | PM tons/yr | PM10 tons/yr |
| Mechanical Drilling Beams & Plates | * | * | NR | NR |
| Saw Cutting Beams & Plates | * | * | NR | NR |
| Flame Cutting Beams & Plates | * | * | NR | NR |
| Punching Beams & Plates | * | * | NR | NR |
| Brazing | * | * | NR | NR |
| Soldering | * | * | NR | NR |
| Flux Cored Arc Welding using Argon (using 80 tons or less of welding consumables) | * | * | NR | NR |
| SUM | * | * | * | * |

* = source certified on application that all insignificant activities combined are less than 5 lbs PM/PM10 per hour and 25 lbs PM/PM10 per day.

25 lbs PM/day * 365/2000 = **4.56 tons per year**

NR = Not Reported

AP-42 emfac Table 12.19-1 for FCAW is, worst case, 57 lbs PM10/1000 lbs of welding consumables:

80 tons/yr * 2000 lbs/ton * 57 lbs PM10/1000 lbs * ton/2000 lbs = **4.56** tons PM10/yr

**Appendix A: Emission Calculations**
**Potential to Emit & Actual Emissions Summary**

**Company Name:** Geiger & Peters, Inc.
**Address City IN Zip:** 761 South Sherman Drive, Indianapolis, Indiana 46203
**Plt ID:** 097-00135
**Permit #:** 097-17400-00135
**Reviewer:** Boris Gorlin

## Unrestricted Potential to Emit

| | P M | | PM 10 | | VOC | | Highest Single HAP | | Combined HAP | |
|---|---|---|---|---|---|---|---|---|---|---|
| | lbs/day | tons/yr | lbs/day | tons/yr | lbs/day | tons/yr | lbs/day | tons/yr | lbs/day | tons/yr |
| Horizontal Roller Blast Machine | 969.6 | 177.0 | 678.7 | 123.9 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Spray Painting Operation | 108.6 | 19.82 | 108.6 | 19.82 | 108.7 | 19.84 | 83.7 | 15.3 | 95.5 | 17.4 |
| Insignificant Activities | | 5.60 | | 5.60 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Total: | 1078.2 | 202.4 | 787.3 | 149.3 | 108.7 | 19.8 | 83.7 | 15.3 | 95.5 | 17.4 |

**326 IAC 6-1-2 (Nonattainment Area Particulate Limitations)**

| | Air Flow, | Grainload., | Limited PM/PM10 Emissions | |
|---|---|---|---|---|
| Horizontal Roller | dscfm | gr/dscf | lb/hr | ton/yr |
| Blast Machine | 8,760 | 0.03 | 2.253 | 9.866 |

## Limited Emissions, after control and at limited coatings usage

| | P M | | PM 10 | | VOC | | Highest Single HAP, less than | | Combined HAP | |
|---|---|---|---|---|---|---|---|---|---|---|
| | lbs/day | tons/yr | lbs/day | tons/yr | lbs/day | tons/yr | lbs/day | tons/yr | lbs/day | tons/yr |
| Horizontal Roller Blast Machine | 2.3 | 9.9 | 2.3 | 9.9 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Spray Painting Operation | 78.7 | 14.4 | 78.7 | 14.4 | 71.2 | 13.0 | 54.8 | 10.0 | 68.5 | 12.5 |
| Insignificant Activities | | 4.56 | | 4.56 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Total: | 80.9 | 28.8 | 80.9 | 28.8 | 71.2 | 13.0 | 54.8 | 10.0 | 68.5 | 12.5 |

| | |
|---|---|
| Spray Painting Operation, unlimited PTE, ton/yr: | 19.82 |
| Insignificant Activities, unlimited PTE, ton/yr: | 4.56 |
| **Horisontal Roller Blast Machine PM 10 Emission Limit, less than, ton/yr:** | **75.62** |