



**MINOR SOURCE OPERATING PERMIT
INDIANA DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**Commercial Finishing Corporation
4001 East 26th Street
Indianapolis, IN 46218**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-19374-00179	
Issued by: John B. Chavez, Administrator Indianapolis Office of Environmental Services	Issuance Date: March 29, 2005 Expiration Date:

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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 Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 and A.2 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary miscellaneous metal parts surface coating operation.

Authorized Individual: **President**
Source Address: **4001 East 26th Street, Indianapolis, IN 46218**
Mailing Address: **4001 East 26th Street, Indianapolis, IN 46218**
General Source Phone: **317-546-1351**
SIC Code: **3479**
County Location: **Marion**
Source Location Status: **Nonattainment for 8 hour ozone and attainment for all other criteria pollutants**
Source Status: **Minor Source Operating Permit
Minor Source, under PSD and Emission Offset Rules
Minor Source, Section 112 of the Clean Air Act**

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (1) Three (3) Binks spray paint booths, identified as PB1, PB2 and PB3, venting to stacks V1, V2 and V3, respectively installed in 1979, each equipped with one (1) airless, electrostatic airless, electrostatic air atomized, or air atomization spray gun for surface coating including miscellaneous metal parts coating, at a maximum capacity of 17.5 units per hour each and a maximum of 0.073 gallons per unit, with dry filters for overspray control with some paint waste going to an onsite distiller and uses one (1) of two (2) natural gas-fired drying ovens.
- (2) One (1) Binks spray paint booth, identified as PB6, vents to stack V5, installed in 1973, equipped with one (1) airless, electrostatic airless, electrostatic air atomized, or air atomization spray gun and one (1) powder coating spray gun for surface coating including miscellaneous metal parts coating, at a maximum capacity of 17.5 units per hour and a maximum of 0.073 gallons per unit, with dry filters for overspray control with some paint waste going to an onsite distiller, and uses one (1) two (2) natural gas-fired drying ovens.
- (3) One (1) gas fired drying oven identified as Oven #2, installed 1979, at a maximum capacity of 125,000 BTU/Hr.
- (4) One (1) gas fired drying oven identified as Oven #3, installed 2004, at a maximum capacity of 600,000 BTU/Hr.
- (5) Two (2) gas space heaters operating at a maximum of 200,000 BTU/Hr each.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

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 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][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 of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, IN 46204

and

Indianapolis OES
Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221

- (d) The notification 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.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

- (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 an "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.8 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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

B.9 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (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
Indianapolis, Indiana 46204

and

Indianapolis OES
Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221

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

- (c) The Permittee shall notify the OAQ and OES within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

B.10 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a permitted 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 this title or the conditions of this permit or any operating permit revisions;
- (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 processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (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.11 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, and OES, Air Permits, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, and OES shall issue a revised permit.

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.

B.12 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to OES within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone number: 317-327-2234, to determine the appropriate permit fee.

B.13 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM and OES, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 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.5 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
Indianapolis, Indiana 46204

and

Indianapolis OES
Air Enforcement
2700 South Belmont Ave.
Indianapolis, IN 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (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

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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
Indianapolis, Indiana 46204

and

Indianapolis OES
Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ, and OES of the actual test date at least fourteen (14) days prior to the actual date.
- (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 the 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.7 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 IDEM commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.8 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.9 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.

Record Keeping and Reporting Requirements

C.10 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to IDEM, OAQ, and OES or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to IDEM, OAQ, and OES using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.11 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (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 IDEM Commissioner or OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the IDEM Commissioner or OES Administrator within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.12 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) 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
Indianapolis, Indiana 46204

and

Indianapolis OES
Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221

- (b) 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.
- (c) Unless otherwise specified in this permit, any annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1

EMMISIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (1) Three (3) Binks spray paint booths, identified as PB1, PB2 and PB3, venting to stacks V1, V2 and V3, respectively installed in 1979, each equipped with one (1) airless, electrostatic airless, electrostatic air atomized, or air atomization spray gun for surface coating including miscellaneous metal parts coating, at a maximum capacity of 17.5 units per hour each and a maximum of 0.073 gallons per unit, with dry filters for overspray control with some paint waste going to an onsite distiller and uses one (1) of two (2) natural gas-fired drying ovens.
- (2) One (1) Binks spray paint booth, identified as PB6, vents to stack V5, installed in 1973, equipped with one (1) airless, electrostatic airless, electrostatic air atomized, or air atomization spray gun and one (1) powder coating spray gun for surface coating including miscellaneous metal parts coating, at a maximum capacity of 17.5 units per hour and a maximum of 0.073 gallons per unit, with dry filters for overspray control with some paint waste going to an onsite distiller, and uses one (1) two (2) natural gas-fired drying ovens.
- (3) One (1) gas fired drying oven identified as Oven #2, installed 1979, at a maximum capacity of 125,000 BTU/Hr.
- (4) One (1) gas fired drying oven identified as Oven #3, installed 2004, at a maximum capacity of 600,000 BTU/Hr.
- (5) Two (2) gas space heaters operating at a maximum of 200,000 BTU/Hr each.

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

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations): The four (4) paint booths shall be limited to one (1) or more of the following for miscellaneous metal parts:

- (a) a daily volume weighted average of 4.3 pounds of VOCs per gallon of coating excluding water delivered to a coating applicator for clear coating application systems;
- (b) a daily volume weighted average of 3.5 pounds of VOCs per gallon of coating excluding water delivered to a coating applicator in the coating application systems that are air dried or forced warm air dried at temperatures up to one hundred ninety-four degrees Fahrenheit (194°F);
- (c) a daily volume weighted average of 3.5 pounds of VOCs per gallon of coating excluding water delivered to a coating applicator for extreme coating application systems; and
- (d) a daily volume weighted average of 3.0 pounds of VOCs per gallon of coating excluding water delivered to a coating applicator for all other coating application systems.
- (e) Solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such manner that evaporation is minimized.

D.1.2 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the paint booths PB1, PB2, PB3, and PB6, shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

- (a) Compliance with each of the applicable VOC content limit contained in condition D.1.1 shall be determined for each coating type pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, and OES, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) When noncompliant coatings for any of the subdivisions of 326 IAC 8-2-9(d) are used for any particular day for a paint booth, compliance with that particular VOC content limit in condition D.1.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average for each of the subdivisions of 326 IAC 8-2-9(d) shall be determined by the following equation:

$$A = \left[\sum_{i=1}^N (C_i) \times U_i \right] / \sum U_i$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and
U is the usage rate of the coating in gallons per day.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.5 Record Keeping Requirements

- (a) To document compliance with condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with each of the VOC usage limit established in condition D.1.1.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on daily basis.

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
 - (C) Records shall demonstrate which subdivision of 326 IAC 8-2-9(d) each coating falls under.
- (3) The volume weighted average VOC content of the coatings used for each day;
 - (4) The daily cleanup solvent usage; and
 - (5) The total VOC usage for each day.
- (b) To document compliance with Condition D.1.3 the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
 - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Indiana Department of Environmental Management
Office of Air Quality
Compliance Data Section
and
Indianapolis OES
Air Compliance**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Commercial Finishing Corporation
Address:	4001 East 26th Street
City:	Indianapolis, IN 46218
Phone #:	317-546-1351
MSOP #:	097-19374-00179

I hereby certify that Commercial Finishing Corporation is still in operation.
 no longer in operation.

I hereby certify that Commercial Finishing Operation is in compliance with the requirements of MSOP 097-19374-00179.
 not in compliance with the requirements of MSOP 097-19374-00179.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Indiana Department of Environmental Management
Office of Air Quality
Compliance Data Section
FAX NUMBER – 317-233-5967
and
Indianapolis OES
Air Compliance
FAX NUMBER – 317-327-2274

MALFUNCTION REPORT

PAGE 1 OF 2

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? _____, 25 TONS/YEAR SULFUR DIOXIDE ? _____, 25 TONS/YEAR NITROGEN OXIDES? _____, 25 TONS/YEAR VOC ? _____, 25 TONS/YEAR HYDROGEN SULFIDE ? _____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? _____, 25 TONS/YEAR FLUORIDES ? _____, 100TONS/YEAR CARBON MONOXIDE ? _____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? _____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? _____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? _____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? _____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERM LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

***SEE PAGE 2**

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name:	Commercial Finishing Corporation
Source Location:	4001 East 26th Street, Indianapolis, IN 46218
County:	Marion
SIC Code:	3479
Operation Permit No.:	OP 98-00179
Operation Permit Issuance Date:	09-30-1998
Minor Source Operation Permit No.:	097-19374-00179
Permit Reviewer:	TJ Edwards

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed an application from Commercial Finishing Corporation relating to operation of miscellaneous metal parts surface coating.

Permitted Emission Units and Pollution Control Equipment

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

- (1) Three (3) Binks spray paint booths, identified as PB1, PB2 and PB3, venting to stacks V1, V2 and V3, respectively installed in 1979, equipped with one (1) airless, electrostatic airless, electrostatic air atomized, and air atomization spray gun for surface coating including miscellaneous metal parts coating, at a maximum capacity of 17.5 units per hour each and a maximum of 0.073 gallons per unit, with dry filters for overspray control with some paint waste going to an onsite distiller.
- (2) One (1) Binks spray paint booth, identified as PB6, vents to stack V5, installed in 1973, equipped with one (1) airless, electrostatic airless, electrostatic air atomized, and air atomization spray gun and one (1) powder coating spray gun for surface coating including miscellaneous metal parts coating, at a maximum capacity of 17.5 units per hour and a maximum of 0.073 gallons per unit, with dry filters for overspray control with some paint waste going to an onsite distiller.
- (3) One (1) gas fired drying oven identified as Oven #1, installed 1979, at a maximum capacity of 125,000 BTU/Hr.
- (4) One (1) gas fired drying oven identified as Oven #2, installed 1979, at a maximum capacity of 125,000 BTU/Hr.
- (5) One (1) gas fired drying oven identified as Oven #3, installed 2004, at a maximum capacity of 600,000 BTU/Hr.
- (6) Two (2) gas space heaters operating at a maximum of 200,000 BTU/Hr each.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

OP 98-00179 issued on **September 30, 1998**

Enforcement Issue

IDEM, OAQ, and OES are aware that the source did not apply for a MSOP renewal in a timely manner. IDEM, OAQ, and OES are reviewing this matter and will take appropriate action.

Recommendation

The staff recommends to the Commissioner that the operation 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.

An application for the purpose of emission statement 326 IAC 2-6 was received on April 12, 2004. Upon further review of the permit issued on September 30, 1998 it was determined that the City of Indianapolis should have issued an MSOP instead of an Operation Permit.

Emission Calculations

See Appendix A, pages 1-5 of this document for detailed emission calculations.

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	48.42
PM-10	48.47
SO ₂	0.0
VOC	78.37
CO	0.0
NO _x	0.0

HAPs	Potential to Emit (tons/yr)
Single HAP	8.16
Combination of HAPs	10.98

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of regulated pollutants are less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

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

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO ₂	maintenance
NO ₂	attainment
1- hour Ozone	maintenance
8- hour Ozone	basic nonattainment
CO	maintenance
Lead	maintenance

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Marion County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, NO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (c) **Fugitive Emissions**
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	48.42
PM-10	48.47
SO ₂	0.00
VOC	78.37
CO	0.00
NO _x	0.00
Single HAP	8.16
Combination HAPs	10.98

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) This existing source is **not** a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ or OES inspector assigned to the source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) applicable to this source. This source is not subject to 40 CFR 63, Subpart M (Surface Coating of Miscellaneous Metal Parts and Products) because it is not a major source of HAPs.

State Rule Applicability – Entire Source

326 IAC 2.1-1.5 (Air Quality Requirements)

On June 15, 2004 Marion County was classified as basic nonattainment for 8 hour ozone. Emissions are less than one hundred (100) tons per year of VOC and NO_x therefore the permittee is not a major source. The drying oven identified as Unit #3 added in 2004 is not a major modification under nonattainment New Source Review.

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not a major source under PSD. The drying oven identified as Unit #3 added in 2004 is not a major modification under PSD.

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

The operation of 4 paint booths will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1(a)(1), (2), and (3), this source is not subject to 326 IAC 2-6 (Emission Reporting) because, as an MSOP source, it is not required to have an operating permit under 326 IAC 2-7, it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year, and it is not located in Lake or Porter Counties. However, pursuant to 326 IAC 2-6-1(b), as a permitted source in Indiana, it is subject to 326 IAC 2-6-5 (Additional Information Requests).

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 the 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.

State Rule Applicability – Individual Facilities

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

Particulate from the paint booths PB1, PB2, PB3, and PB6 shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

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

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

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

Paint Booths PB1, PB2, PB3 and PB6 are subject to 8-2-9 because they coat miscellaneous metal parts under SIC code 3479. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the four (4) paint booths shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for airdried or forced warm air dried coatings. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the four (4) paint booths shall be limited to 4.3 pounds of VOCs per gallon of coating less water, for clear coatings. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the four (4) paint booths shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the four (4) paint booths shall be limited to 3.0 pounds of VOCs per gallon of coating less water, for all other coatings and coating application systems.

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.

Conclusion

The operation of this miscellaneous metal parts surface coating operation shall be subject to the conditions of the Minor Source Operating Permit 097-19374-00179.

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

Addendum to the Technical Support Document
for a **MSOP**

Source Name:	Commercial Finishing Corporation
Source Location:	4001 East 26th Street
County:	Marion
SIC Code:	3479
Operation Permit No.:	097-19374-00179
Permit Reviewer:	TJ Edwards

On January 20, 2005, the Office of Air Quality (OAQ) and the Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Commercial Finishing Corporation had applied for a Minor Source Operating Permit (MSOP) relating to the operation of miscellaneous metal parts surface coating. The notice also stated that OAQ and OES proposed to issue a permit 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.

On February 18th, 2005 Mary Ann Saggese of Plews Shadley Racher & Braun Attorneys at Law, submitted comments on behalf of Commercial Finishing Corporation regarding the draft MSOP. Upon further review, the OAQ and OES have decided to make the following revisions to MSOP. The TSD will remain as it originally appeared when published. Changes to the permit or technical support material that occur after the permit has published for public notice 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 and the language with strikeout has been deleted. The Table of Contents has been modified to reflect these changes.

The comments and responses, including changes to the permit, are as follows:

Comment 1: Conditions A.2 (1), D.1(1)-(3)TSD, Page 1 (Permitted Emission Units)

The emission units descriptions in the above-noted conditions require correction as shown in italics and bold below for A.2, as an example:

1. Three (3) Binks spray paint booths, identified as PB1, PB2 and PB3, venting to stacks V1, V2 and V3, respectively installed in 1979, ***each*** equipped with one (1) airless, electrostatic airless, electrostatic air atomized, ~~or and~~ air atomization spray gun for surface coating including miscellaneous metal parts coating, at a maximum capacity of 17.5 units per hour each and a maximum of 0.073 gallons per unit, with dry filters for overspray control with some paint waste going to an onsite distiller, ***and using 1 of 2 natural gas-fired drying ovens.***

2. One (1) Binks spray paint booth, identified as PB6, vents to stack V5, installed in 1973, equipped with one (1) airless, electrostatic airless, electrostatic air atomized, or air atomization spray gun and one (1) powder coating spray gun for surface coating including miscellaneous metal parts coating, at a maximum capacity of 17.5 units per hour and a maximum of 0.073 gallons per unit, with dry filters for overspray control with some paint waste going to an onsite distiller, and uses one (1) of ~~two (2) four (4)~~ natural gas-fired drying ovens.
3. ~~One (1) gas fired drying oven identified as Oven #1, installed 1979, at a maximum capacity of 125,000 BTU/Hr.~~
This oven #1 was removed.

Condition A.2(4)-(6) were previously listed as insignificant activities and Commercial Finishing believes they should remain insignificant activities.

Response to Comment 1:

The emission units descriptions have been corrected as requested above. The new language appears in bold while the old language has a line through it:

1. Three (3) Binks spray paint booths, identified as PB1, PB2 and PB3, venting to stacks V1, V2 and V3, respectively installed in 1979, **each** equipped with one (1) airless, electrostatic airless, electrostatic air atomized, ~~or and~~ air atomization spray gun for surface coating including miscellaneous metal parts coating, at a maximum capacity of 17.5 units per hour each and a maximum of 0.073 gallons per unit, with dry filters for overspray control with some paint waste going to an onsite distiller, **and uses one (1) of two (2) natural gas-fired drying ovens.**
2. One (1) Binks spray paint booth, identified as PB6, vents to stack V5, installed in 1973, equipped with one (1) airless, electrostatic airless, electrostatic air atomized, or air atomization spray gun and one (1) powder coating spray gun for surface coating including miscellaneous metal parts coating, at a maximum capacity of 17.5 units per hour and a maximum of 0.073 gallons per unit, with dry filters for overspray control with some paint waste going to an onsite distiller, and uses one (1) of ~~two (2) four (4)~~ natural gas-fired drying ovens.
4. ~~One (1) gas fired drying oven identified as Oven #1, installed 1979, at a maximum capacity of 125,000 BTU/Hr.~~

326 IAC 2-6.1 does not differentiate between significant activities and insignificant activities. All emitting units are listed in an MSOP therefore there is no change.

Comment 2: Condition B.6 (b) Annual Notification

Commercial Finishing respectfully requests that the Annual Notification requirements in the MSOP present solely the specific language stated in 326 IAC 2-6.1-5 (a)(5) which requires that the permit contain

(5) A requirement that an authorized individual provide an annual notice to the department that the source is in operation and **in compliance** with the permit or registration.

The draft MSOP includes a requirement to report noncompliance “at any time during the year” in addition to the permittee’s compliance status. The MSOP regulations were strictly constructed to require a statement of compliance status at the time of submitting the Annual Notification, but not to include an accounting of any past issues of noncompliance which have since been resolved. The draft MSOP condition elevates the Annual Notification to the level of an Annual Compliance Certification pursuant to the Part 70 Permit requirements. This is without merit and is overreaching regulatory authority. Commercial Finishing requests that the Condition B.6(b) be revised to be consistent with the regulatory requirement by deleting the second sentence in provision (b).

Response to Comment 2:

IDEM OAQ and OES do not agree with the statement that the annual notification is a statement of compliance status only at the time of submitting the Annual Notification. The annual notice, as referred to in 326 IAC 2-6.1-5(a)(5), covers the entire compliance period. Therefore the “in compliance” refers to the time period covered by the Annual Notification. In addition, 326 IAC 2-7 and 326 IAC 2-6.1 are two different rules, any comparison of the two is unrelated and immaterial to the requirements of each rule.

Comment 3: Condition D.1.2 (b) and (c) Particulate Emissions

The requirements of D.1.2 (b) and (c) have been newly added to the Commercial Finishing permit without regulatory authority. 326 IAC 6-3-2(d) does not require that the permittee take these specific actions nor to be repetitive of the PMP . Condition D.1.3 requires that the dry particulate filters for the paint booths be inspected already under the PMP requirement. This facility has no past compliance issues with the dry filters or visible overspray to warrant the inclusion of (b) and (c). In addition, the particulate PTE for this facility is not of a level to warrant this condition. The facility is less than 50% of the Title V permit thresholds for PM. 326 IAC 2-6.1-5(a)(2) only requires “reasonable information to evaluate compliance”. This is not reasonable and it is over burdensome to require Commercial Finishing to perform this action as another separate requirement.

Response to Comment 3:

Pursuant to 326 IAC 6-3-1 all surface coating manufacturing processes that use greater than five (5) gallons/day are subject to 326 IAC 6-3-2 (d). Therefore PB1, PB2, PB3 and PB6 paint booths are subject to the rule. 326 IAC 6-3-2(d) does require the action in D.1.2 (b) and (c).

Comment 4: TSD, Page 2 of 5

The Recommendation section of the TSD correctly states “that the City of Indianapolis should have issued a MSOP instead of an Operation Permit” on September 30, 1998. Dave Foster, OES, had informed Commercial Finishing at that time that the agency would handle converting the permit to an MSOP since no further application was warranted. Commercial Finishing understood that the MSOP would eventually be forthcoming. The Operation Permit No. 98-00179 does not contain an expiration date and without the MSOP having been officially issued, Commercial Finishing was not required to apply for a MSOP renewal. We respectfully request that the sentence under the Enforcement section be removed as inaccurate. The Enforcement section should state that “there are no enforcement actions pending.”

Response to Comment 4:

OES has further researched the matter and no MSOP Renewal Application was required. There are no enforcement actions pending.

IDEM and OES Change 1:

The Emission Unit Descriptions of Section D.1 should be the same as in Section A. Therefore the Emission Unit descriptions of Section D.1 have been changed as follows:

Emissions Unit Description:

- (1) ~~One (1) Binks spray paint booth, identified as PB1, vents to stack V1, installed in 1979, equipped with one (1) airless, electrostatic airless, electrostatic air atomized, or air atomization spray gun for surface coating including miscellaneous metal parts coating, at a maximum capacity of 17.5 units per hour and a maximum of 0.073 gallons per unit, with dry filters for overspray control with some paint waste going to an onsite distiller, and uses one (1) of four (4) natural gas-fired drying ovens.~~
- ~~(2) One (1) Binks spray paint booth, identified as PB2, vents to stack V2, installed in 1979, equipped with one (1) airless, electrostatic airless, electrostatic air atomized, or air atomization spray gun for surface coating including miscellaneous metal parts coating, at a maximum capacity of 17.5 units per hour and a maximum of 0.073 gallons per unit, with dry filters for overspray control with some paint waste going to an onsite distiller, and uses one (1) of four (4) natural gas-fired drying ovens.~~
- ~~(3) One (1) Binks spray paint booth, identified as PB3, vents to stack V3, installed in 1979, equipped with one (1) airless, electrostatic airless, electrostatic air atomized, or air atomization spray gun for surface coating including miscellaneous metal parts coating, at a maximum capacity of 17.5 units per hour and a maximum of 0.073 gallons per unit, with dry filters for overspray control with some paint waste going to an onsite distiller, and uses one (1) of four (4) natural gas-fired drying ovens.~~
- (4) One (1) Binks spray paint booth, identified as PB6, vents to stack V5, installed in 1973, equipped with one (1) airless, electrostatic airless, electrostatic air atomized, or air atomization spray gun and one (1) powder coating spray gun for surface coating including miscellaneous metal parts coating, at a maximum capacity of 17.5 units per hour and a maximum of 0.073 gallons per unit, with dry filters for overspray control with some paint waste going to an onsite distiller, and uses one (1) of four (4) natural gas-fired drying ovens.

- (1) Three (3) Binks spray paint booths, identified as PB1, PB2 and PB3, venting to stacks V1, V2 and V3, respectively installed in 1979, each equipped with one (1) airless, electrostatic airless, electrostatic air atomized, or air atomization spray gun for surface coating including miscellaneous metal parts coating, at a maximum capacity of 17.5 units per hour each and a maximum of 0.073 gallons per unit, with dry filters for overspray control with some paint waste going to an onsite distiller and uses one (1) of two (2) natural gas-fired drying ovens.**
- (2) One (1) Binks spray paint booth, identified as PB6, vents to stack V5, installed in 1973, equipped with one (1) airless, electrostatic airless, electrostatic air atomized, or air atomization spray gun and one (1) powder coating spray gun for surface coating including miscellaneous metal parts coating, at a maximum capacity of 17.5 units per hour and a maximum of 0.073 gallons per unit, with dry filters for overspray control with some paint waste going to an onsite distiller, and uses one (1) two (2) natural gas-fired drying ovens.**
- (3) One (1) gas fired drying oven identified as Oven #2, installed 1979, at a maximum capacity of 125,000 BTU/Hr.**
- (4) One (1) gas fired drying oven identified as Oven #3, installed 2004, at a maximum capacity of 600,000 BTU/Hr.**
- (5) Two (2) gas space heaters operating at a maximum of 200,000 BTU/Hr each.**

IDEM and OES Change 2:

Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, the condition reflecting this rule will be incorporated into your permit as follows:

B.13 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

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

**Company Name: Commercial Finishing (Micro Metal)
Address City IN Zip: 4001 East 26th Street, 46218
MSOP No.: 097-19374-00179
Vent ID: Total VOC's for Paint Booths, PB1, PB2, PB3, and PB6
Reviewer: TJ Edwards
Date: August 3, 2004**

SIC: 3479

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
G74YC700	9.2	37.2%	0.0%	37.2%	0.0%	48.8%	0.0120	96.67	3.43	3.43	3.97	95.39	17.41	7.35	7.02	75%
E61YC701	12.7	26.3%	0.0%	26.3%	0.0%	51.1%	0.0180	13.33	3.33	3.33	0.80	19.17	3.50	2.45	6.52	75%
F63B70	11.5	30.5%	0.0%	30.5%	0.0%	51.2%	0.0075	333.33	3.49	3.49	8.73	209.53	38.24	21.78	6.82	75%
F63VXG1438	11.8	29.0%	0.0%	29.0%	0.0%	71.0%	0.0160	50.00	3.42	3.42	2.74	65.76	12.00	7.35	4.82	75%
F63W77	12.2	28.7%	0.0%	28.7%	0.0%	71.3%	0.0360	60.00	3.50	3.50	7.56	181.36	33.10	20.56	4.91	75%
F63VXA1479	12.1	28.9%	0.0%	28.9%	0.0%	71.1%	0.0550	33.33	3.49	3.49	6.41	153.72	28.05	17.25	4.91	75%
F63W81	10.2	32.2%	0.0%	32.2%	0.0%	68.7%	0.0350	83.33	3.27	3.27	9.55	229.22	41.83	22.02	4.77	75%
F63VXL1374	11.9	29.3%	0.0%	29.3%	0.0%	70.7%	0.0250	43.33	3.49	3.49	3.78	90.80	16.57	10.00	4.94	75%
F63VXH1337	12.2	28.8%	0.0%	28.8%	0.0%	71.2%	0.0730	70.00	3.50	3.50	17.88	429.14	78.32	48.41	4.91	75%
LS32007	11.4	24.4%	0.0%	24.4%	0.0%	63.1%	0.2500	3.33	2.77	2.77	2.31	55.33	10.10	7.82	4.39	75%
LS12003	10.6	24.7%	0.0%	24.7%	0.0%	63.3%	0.2500	3.33	2.61	2.61	2.17	52.06	9.50	7.24	4.12	75%
890	10.5	25.0%	0.0%	25.0%	0.0%	65.0%	0.0450	36.67	2.61	2.61	4.31	103.46	18.88	14.16	4.02	75%
LS82001	9.2	27.0%	0.0%	27.0%	0.0%	69.7%	0.2500	3.33	2.48	2.48	2.06	49.52	9.04	6.11	3.56	75%
LS32007	8.8	29.2%	0.0%	29.2%	0.0%	63.9%	0.2500	3.33	2.56	2.56	2.13	51.11	9.33	5.65	4.00	75%

State Potential Emissions based upon worst case coating, maximum units per hour and 8,760 hours/yr.

17.88 429.14 78.32 48.41

Maximum (unit/hr) based upon:

- Application (12/96) states that 6 booths were operable;
- Letter (7/98) states 2 booths were taken out of service; and
- Therefore, Maximum units/hr are 2/3 of values provided in Application.

METHODOLOGY

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

Transfer efficiency was estimated at 75% for flat surface work and electrostatic air atomized, per "Air Pollution Engineering Manual" (AP-40), Table 2, page 362, 1992 edition.

Appendix A: Emissions Calculations
 HAP Emission Calculations
 From Surface Coating Operations

Company Name: Commercial Finishing (Micro Metal)
Address City IN Zip: 4001 East 26th Street, 46218
MSOP No.: 097-19374-00179
Vent ID: Total HAP's for Paint Booths: PB1, PB2, PB3, and PB6
Reviewer: TJ Edwards
Date: August 3, 2004

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % 2-Butoxyethanol (glycol ether)	Weight % Methyl Ethyl Ketone	Weight % Glycol Ethers	Weight % Toluene	Weight % Xylene	Weight % Methyl Isobutyl Ketone	Weight % Benzene	Weight % Ethylbenzene	2-Butoxyeth- onal (ton/yr) (glycol ether)	Methyl Ethyl Ketone (ton/yr)	Glycol Ethers (ton/yr)	Toluene (ton/yr)	Xylene (ton/yr)	Methyl Isobutyl Ketone (ton/yr)	Benzene (ton/yr)	Ethylbenzene (ton/yr)	Total Potential per coating (tons/yr)	
G74YC700	9.21	0.0120	96.67	3.0%	2.0%	12.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.40	0.94	5.62	0.00	0.00	0.00	0.00	0.00	0.00	7.96
E61YC701	12.66	0.0180	13.33	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
F63B70	11.45	0.0075	333.33	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
F63VXG1438	11.81	0.0160	50.00	0.0%	0.0%	0.0%	3.0%	1.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	1.24	0.41	0.00	0.00	0.00	0.00	1.66
F63W77	12.91	0.0360	60.00	0.0%	0.0%	0.0%	3.0%	1.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	3.66	1.22	0.00	0.00	0.00	0.00	4.89
F63VXA1479	12.09	0.0550	33.33	0.0%	0.0%	0.0%	3.0%	1.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	2.91	0.97	0.00	0.00	0.00	0.00	3.88
F63W81	10.70	0.0350	83.33	0.0%	0.0%	0.0%	3.0%	0.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	4.10	0.00	0.00	0.00	0.00	0.00	4.10
F63VXL1374	11.92	0.0250	43.33	0.0%	0.0%	0.0%	3.0%	1.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	1.70	0.57	0.00	0.00	0.00	0.00	2.26
F63VXH1337	12.15	0.0730	70.00	0.0%	0.0%	0.0%	3.0%	1.0%	0.0%	0.0%	0.0%	0.00	0.00	0.00	8.16	2.72	0.00	0.00	0.00	0.00	10.88
LS32007	11.35	0.2500	3.33	0.0%	0.0%	0.0%	0.0%	5.4%	1.2%	0.0%	1.4%	0.00	0.00	0.00	0.00	2.23	0.50	0.00	0.58	0.00	3.31
LS12003	10.55	0.2500	3.33	0.0%	0.0%	0.0%	0.0%	6.8%	1.2%	0.0%	0.0%	0.00	0.00	0.00	0.00	2.62	0.46	0.00	0.00	0.00	3.08
890	9.28	0.0450	36.67	0.0%	0.0%	0.0%	0.0%	0.0%	10.0%	0.1%	0.0%	0.00	0.00	0.00	0.00	0.00	6.71	0.07	0.00	0.00	6.77
LS82001	9.18	0.2500	3.33	0.0%	0.0%	0.0%	0.0%	8.9%	1.2%	0.0%	0.0%	0.00	0.00	0.00	0.00	2.98	0.40	0.00	0.00	0.00	3.38
LS32007	8.76	0.2500	3.33	0.0%	0.0%	0.0%	0.0%	6.8%	1.7%	0.0%	1.7%	0.00	0.00	0.00	0.00	2.17	0.54	0.00	0.54	0.00	3.26

State Potential Emissions based upon worst case HAP loading and 8,760 hr/yr.

1.40 0.94 5.62 8.16 2.98 6.71 0.07 0.58 10.88

METHODOLOGY

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

Application (12/96) states that 6 booths were operable;
 Letter (7/98) states 2 booths were taken out of service; and
 Therefore, Maximum units/hr are 2/3 of values provided in Application.

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

**Company Name: Commercial Finishing (Micro Metal)
Address City IN Zip: 4001 East 26th Street, 46218
MSOP No.: 097-19374-00179
Vent ID: PTE Summary
Reviewer: TJ Edwards
Date: August 3, 2004**

	PM	PM-10	SO2	NOx	CO	VOC	HAPS Single	HAPS Combination
Paint Booths PB1, PB2, PB3, and PB6	48.41	48.41	0	0	0	78.32	816	10.88
Insignificant	0.00	0.00	0	0	0	0.00	0	0.00
Total Emissions	48.41	48.41	0	0	0	78.32	816	10.88

Maximum (unit/hr) based upon:

Application (12/96) states that 6 booths were operable;
Letter (7/98) states 2 booths were taken out of service; and
Therefore, Maximum units/hr are 2/3 of values provided in Application.

Appendix A: Emissions Calculations
Particulate
From Surface Coating Operations

Company Name: Commercial Finishing (Micro Metal)
Address City IN Zip: 4001 East 26th Street, 46218
MSOP No.: 097-19374-00179
6-3-2 Compliance Calculations
Reviewer: TJ Edwards
Date: August 3, 2004

$$(70 \text{ units/hour}) * (0.073 \text{ gal/unit}) * (12.2 \text{ lbs/gal}) * (\text{Weight \% solids}) * (1 - \text{transfer eff.}) * (\text{ton}/2,000\text{lbs}) = 0.0022 \text{ tons/hr}$$

Where Weight % solids = 28.8 %
 Transfer Efficiency = 75%

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

Where E = Rate of emission in pounds per hour, and
 P = Process weight rate in tons per hour.

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

$$E = 4.10 * 0.083^{0.67}$$

$$E = 4.10 * 0.0404$$

$$E = 0.1657 \text{ lb/hr}$$

Use 0.551 lb per hour, per process weight table found at 326 IAC 6-3-2(c).

$$(70 \text{ units/hour}) * (0.073 \text{ gal/unit}) * (12.2 \text{ lbs/gal}) * (\text{Weight \% solids}) * (1 - \text{transfer eff.}) * (1 - \text{control eff.}) = 0.539 \text{ lbs/hr}$$

Where: Filter collection efficiency = 88%

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

Company Name: Commercial Finishing Corporation

Company Address: 4001 East 26th Street, Indianapolis, IN 46218

Permit Number: 097-19374-00179

Reviewer: TJ Edwards

Date: August 20, 2004

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.75	Oven #3	6.6
0.13	Oven #1	1.1
0.13	Oven #2	1.1
0.20	Space Heater	1.8
0.60	Overhead Oven	5.3

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr						
Oven #3	0.0062	0.0250	0.0020	0.3285	0.0181	0.2759
Oven #1	0.0010	0.0042	0.0003	0.0548	0.0030	0.0460
Oven #2	0.0010	0.0042	0.0003	0.0548	0.0030	0.0460
Space Heater	0.0017	0.0067	0.0005	0.0876	0.0048	0.0736
Overhead Oven	0.0050	0.0200	0.0016	0.2628	0.0145	0.2208
Total:	0.0150	0.0599	0.0047	0.7884	0.0434	0.6623

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note to Reviewer: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.