INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: March 3, 2005

RE: Manchester Tank and Equipment Company / 093-19707-00010

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-MOD.dot 1/10/05

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March 3, 2005

Mr. Ken McGaha
Manchester Tank and Equipment Company
905 "X" Street
Bedford, IN 47421

Re: 093-19707
Third Minor Permit Modification to
Part 70 No.: T 093-7549-00010

Dear Mr. McGaha:

Manchester Tank and Equipment Company was issued a permit on November 2, 2000 for a metal pressure vessels manufacturing plant. A letter requesting changes to this permit was received on September 3, 2004. Pursuant to the provisions of 326 IAC 2-7-12 a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

One (1) metal oxyfuel/plasma cutting machine, identified as PC-1, used for cutting mild steel, aluminum and stainless steel, controlled by one (1) cartridge filter.

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

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Linda Quigley/EVP, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call Linda Quigley at (973) 575-2555, extension 3284, or call (800) 451-6027, press 0 and ask for extension (3-6878).

Sincerely,

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

Attachments
(LQ/EVP)
cc: File - Lawrence County
U.S. EPA, Region V
Lawrence County Health Department
Air Compliance Section Inspector - Ray Schick
Compliance Data Section
Administrative and Development
Technical Support and Modeling

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Manchester Tank and Equipment Company
905 "X" Street
Bedford, Indiana 47421

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

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 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T093-7549-00010	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: November 2, 2000 Expiration Date: November 2, 2005

First Administrative Amendment, 093-14249-00010, issued August 9, 2001
First Minor Permit Modification, 093-14395-00010, issued July 24, 2001
Second Minor Permit Modification, 093-14759-00010, issued October 16, 2001
Second Administrative Amendment, 093-15412-00010, issued May 13, 2002

Third Minor Permit Modification No.: 093-19707-00010	Pages Affected: 4, 29a
Issued by: Original Signed by Paul Dubenetzky Office of Air Quality	Issuance Date: March 3, 2005

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ. 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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates stationary metal pressure vessels manufacturing plant.

Responsible Official:	Ken McGaha
Source Address:	905 “X” Street, Bedford, Indiana 47421
Mailing Address:	905 “X” Street, Bedford, Indiana 47421
Phone Number:	(812) 275-5931
SIC Code:	3443
County Location:	Lawrence
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD or Emission Offset Rules Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) One (1) paint spray booth, identified as #7, utilizing an air atomization system, coating a maximum of 911 square feet of steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C4;

(b) One (1) paint spray booth, identified as PP1, utilizing an airless and air-assisted airless system, coating a maximum of 1180 square feet of steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one stack, identified as PP-01;

(c) One (1) natural gas fired bake oven, identified as BkO1, with a maximum heat input capacity of 1.65 million British thermal units per hour (MMBtu/hr), for drying the coated tanks from spray booth PP1, with emissions exhausting to stacks BkO-01 and BkO-02;

(d) One (1) metalizing process, identified as MP1, coating a maximum of 42 square feet of steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as MP-01;

(e) One (1) pneumatic blasting operation, identified as SB1, utilizing dry filters for particulate matter control, exhausting to one (1) stack, identified as SB-01; and

(f) One (1) metal oxyfuel/plasma cutting machine, identified as PC-1, used for cutting mild steel, aluminum and stainless steel, controlled by a six (6) cartridge filter.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

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

(b) One (1) metal oxyfuel/plasma cutting machine, identified as PC-1, used for cutting mild steel, aluminum and stainless steel, controlled by a six (6) cartridge filter.

(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 2-7-5(1)]

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

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

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

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

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the metal oxyfuel/plasma cutting machine shall not exceed the emission rate established with the following equation:

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

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

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Modification and Minor Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	**Manchester Tank and Equipment Company**
Source Location:	**905 "X" Street, Bedford, Indiana 47421**
County:	**Lawrence**
SIC Code:	**3443**
Operation Permit No.:	**T093-7549-00010**
Operation Permit Issuance Date:	**November 2, 2000**
Source Modification No.:	**MSM 093-19571-00010**
Permit Modification No.:	**MPM 093-19707-00010**
Permit Reviewer:	**LQ/EVP**

The Office of Air Quality (OAQ) has reviewed a modification application from Manchester Tank and Equipment Company relating to the construction and operation of a metal oxyfuel/plasma cutting machine.

History

On September 3, 2004, Manchester Tank and Equipment Company submitted an application to the OAQ requesting to add a metal oxyfuel/plasma cutting machine to their existing plant. Manchester Tank and Equipment Company was issued a Part 70 permit on November 2, 2000.

New Emission Units and Pollution Control Equipment

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

One (1) metal oxyfuel/plasma cutting machine, identified as PC-1, used for cutting mild steel, aluminum and stainless steel, controlled by one (1) cartridge filter.

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

The source was issued a Part 70 Operating Permit (T093-7549-00010) on November 2, 2000. The source has since received the following:

(a) First Administrative Amendment No.: 093-14249-00010, issued on August 9, 2001;
(b) First Minor Permit Modification No.: 093-14395-00010, issued on July 24, 2001;
(c) Second Minor Permit Modification No.: 093-14759-00010, issued on October 16, 2001; and
(d) Second Administrative Amendment No.: 093-15412-00010, issued on May 13, 2002.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Minor Source Modification and Minor Permit Modification 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 application for the purposes of this review was received on September 3, 2004. Additional information was received on September 24, 2004, October 8, 2004, and October 14, 2004.

Emission Calculations

See Appendix A of this document for detailed emissions calculations, page one (1) of one (1).

Potential To Emit Before Controls (Modification)

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

Pollutant	Potential To Emit (tons/year)
PM	21.99
PM-10	21.99
SO_2	0.00
VOC	0.00
CO	0.00
NO_x	0.00

HAP's	Potential To Emit (tons/year)
Arsenic	Less than 10
Cadmium	Less than 10
Chromium	Less than 10
Manganese	Less than 10
Nickel	Less than 10
Phosphorus	Less than 10
Lead	Less than 10
Antimony	Less than 10
Selenium	Less than 10
TOTAL	Less than 25

Justification for Modification

The Title V permit is being modified through a Minor Source Modification and Minor Permit Modification. The minor source modification is being performed pursuant to 326 IAC 2-7-10.5(d)(4) because it is a modification which has the potential to emit less than twenty-five (25) tons per year, but greater than five (5) tons per year of PM and PM10. The minor permit modification is being performed pursuant to 326 IAC 2-7-12**,** because pursuant to 326 IAC 2-7-10.5(e)(3)(A)(i), operation of the modification may commence in accordance with 326 IAC 2-7-12.

County Attainment Status

The source is located in Lawrence County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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 emissions and NOx are considered when evaluating the rule applicability relating to ozone. Lawrence County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx 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.

(b) Lawrence County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. 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.

Source Status

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

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Comb. HAPs (tons/yr)
Source PTE	**85.79**	**86.79**	**0.02**	**4.25**	**53.72**	**3.88**	**44.85**

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

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

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

Potential to Emit After the Proposed Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

Unit	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Comb. HAPs (tons/yr)
Existing Source PTE	86.79	86.79	0.02	4.25	53.72	3.88	44.85
Proposed Mod. (controlled)	0.22	0.22	-	-	-	-	7.07E-03
Total	87.01	87.01	0.02	4.25	53.72	3.88	44.86

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

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in the permit as a result of this modification.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) included in the permit as a result of this modification.

State Rule Applicability - Entire Source

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

This source is still not subject to the requirements of 326 IAC 2-2. As seen on the Potential to Emit After Modification Table above, no criteria pollutant is emitted at a rate of 250 ton per year or greater. This source is not one of the twenty-eight (28) listed source categories. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) do not apply to this source.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2006 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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 forty percent (40%) 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 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the metal oxyfuel/plasma cutting machine 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.

State Rule Applicability - Individual Facilities

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

Pursuant to 326 IAC 6-3-1(b)(10), the metal oxyfuel/plasma cutting machine is exempt from particulate emission limitations for manufacturing processes because less than three thousand four hundred (3,400) inches per hour of stock, one (1) inch thickness or less, is cut.

40 CFR Part 52 Subpart P (Process Operations)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3(Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain an applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the metal oxyfuel/plasma cutting machine shall be limited by the following:

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

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

Compliance Requirements

Permits issued under 326 IAC 2-7 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 2-7-5. 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.

There are no compliance monitoring requirements applicable to this modification.

Changes Proposed

The changes listed below have been made to the Part 70 Operating Permit (T093-7549-00010).

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) One (1) paint spray booth, identified as #7, utilizing an air atomization system, coating a maximum of 911 square feet of steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C4;

(b) One (1) paint spray booth, identified as PP1, utilizing an airless and air-assisted airless system, coating a maximum of 1180 square feet of steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one stack, identified as PP-01;

(c) One (1) natural gas fired bake oven, identified as BkO1, with a maximum heat input capacity of 1.65 million British thermal units per hour (MMBtu/hr), for drying the coated tanks from spray booth PP1, with emissions exhausting to stacks BkO-01 and BkO-02;

(d) One (1) metalizing process, identified as MP1, coating a maximum of 42 square feet of steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as MP-01; ~~and~~

(e) One (1) pneumatic blasting operation, identified as SB1, utilizing dry filters for particulate matter control, exhausting to one (1) stack, identified as SB-01; **and**

(f) One (1) metal oxyfuel/plasma cutting machine, identified as PC-1, used for cutting mild steel, aluminum and stainless steel, controlled by one (1) cartridge filter.

Conclusion

The construction and operation of this metal oxyfuel/plasma cutting machine shall be subject to the conditions of the attached proposed **Minor Source Modification No. 093-19571-00010 and Minor Permit Modification No. 093-19707-00010**.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document for a Minor Permit Modification to a Part 70 Permit

Source Background and Description

Source Name:	**Manchester Tank and Equipment Company**
Source Location:	**905 "X" Street, Bedford, Indiana 47421**
County:	**Lawrence**
SIC Code:	**3443**
Operation Permit No.:	**T093-7549-00010**
Permit Modification No.:	**MPM093-19707-00010**
Permit Reviewer:	**Linda Quigley/EVP**

On December 2, 2004, the Office of Air Quality (OAQ) had a notice published in the Times-Mail in Bedford, Indiana, stating that Manchester Tank and Equipment Company had applied for a Permit Modification to their Part 70 Operating Permit to operate a metal oxyfuel/plasma cutting machine. The notice also stated that OAQ proposed to issue a Minor Permit Modification 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 modification should be issued as proposed.

On December 14, 2004, Manchester Tank and Equipment Company submitted comments on the proposed Minor Permit Modification. The summary of comments and corresponding responses are as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

The description of the new cutting torch should be modified on page 4 A.2(f) and TSD page 6(f) as follows:

One (1) metal oxyfuel/plasma cutting machine, identified as PC-1, used for cutting mild steel, aluminum and stainless steel, controlled by ~~one (1)~~ **a six (6)** cartridge filter.

Response 1

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the 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.

Section A.2(f) has been revised as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3) [326 IAC 2-7-5(15)]

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

(f) One (1) metal oxyfuel/plasma cutting machine, identified as PC-1, used for cutting mild steel, aluminum and stainless steel, controlled by ~~one (1)~~ **a six (6)** cartridge filter.

Comment 2

The process limitation of three thousand four hundred (3,400) inches per hour of stock, one (1) inch thickness or less that exempts the source from the requirements of State Rule 326 IAC 6-3 should be removed since the source will occasionally cut steel that is greater than one inch. Therefore, Rule 3, Process Operations, of Article 6 would apply to the proposed oxyfuel/plasma cutting machine.

The allowable emission rate for this operation would be determined by the following formula:

$E = 4.10P^{0.67}$

Where E = allowable emission in lbs/hr
P = process weight rate in tons/hr

Response 2

The metal oxyfuel/plasma cutting machine has been added to Section D.2 as follows:

SECTION D.2 FACILITY OPERATION CONDITIONS

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

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

(b) One (1) metal oxyfuel/plasma cutting machine, identified as PC-1, used for cutting mild steel, aluminum and stainless steel, controlled by a six (6) cartridge filter.

(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 2-7-5(1)]

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

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

$E = 4.10 * P^{0.67}$

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

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the metal oxyfuel/plasma cutting machine shall not exceed the emission rate established with the following equation:

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

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

D.2.~~2~~**3** Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Appendix A: Emissions Calculations
Metal Oxyfuel/Plasma Cutting Machine

Company Name: Manchester Tank and Equipment Company
Address City IN Zip: 905 X Street, Bedford, Indiana 47421
MSM No.: 093-19571-00010
MPM No.: 093-19707-00010
Plt ID: 093-00010
Reviewer: Linda Quigley/EVP
Date: September 15, 2004

Plasma Cutting

Emission Factors (lb/hr cutting)			
Pollutant	**Mild Steel**	**Aluminum**	**Stainless Steel**
PM	1.70E+00	5.02E+00	1.28E+00
Arsenic	1.70E-04	1.54E-03	1.23E-03
Cadmium	1.18E-05	7.48E-07	0.00E+00
Chromium	5.80E-05	2.65E-04	5.85E-02
Manganese	1.60E-02	8.76E-04	7.08E-02
Nickel	4.04E-04	7.03E-05	3.05E-02
Phosphorus	7.00E-04	7.38E-04	4.21E-04
Lead	1.17E-04	7.88E-05	2.89E-06
Antimony	5.05E-06	8.07E-05	0.00E+00
Selenium	5.48E-05	8.07E-06	5.11E-05

Note: Emission factors (lb/hr cutting) are supplied by manufacturer.

	Uncontrolled						Controlled		
	Emission Rate in lb/yr			Emission Rate in ton/yr cutting			Emission Rate in ton/yr cutting		
Pollutant	**Mild Steel**	**Aluminum**	**Stainless Steel**	**Mild Steel**	**Aluminum**	**Stainless Steel**	**Mild Steel**	**Aluminum**	**Stainless Steel**
PM	14892.00	43975.20	11212.80	7.45	**21.99**	5.61	0.07	**0.22**	0.06
Arsenic	1.49	13.49	10.77	7.45E-04	6.75E-03	5.39E-03	7.45E-06	6.75E-05	5.39E-05
Cadmium	0.10	0.01	0.00	5.17E-05	3.28E-06	0.00E+00	5.17E-07	3.28E-08	0.00E+00
Chromium	0.51	2.32	512.46	2.54E-04	1.16E-03	2.56E-01	2.54E-06	1.16E-05	2.56E-03
Manganese	140.16	7.67	620.21	7.01E-02	3.84E-03	**3.10E-01**	7.01E-04	3.84E-05	**3.10E-03**
Nickel	3.54	0.62	267.18	1.77E-03	3.08E-04	1.34E-01	1.77E-05	3.08E-06	1.34E-03
Phosphorus	6.13	6.46	3.69	3.07E-03	3.23E-03	1.84E-03	3.07E-05	3.23E-05	1.84E-05
Lead	1.02	0.69	0.03	5.12E-04	3.45E-04	1.27E-05	5.12E-06	3.45E-06	1.27E-07
Antimony	0.04	0.71	0.00	2.21E-05	3.53E-04	0.00E+00	2.21E-07	3.53E-06	0.00E+00
Selenium	0.48	0.07	0.45	2.40E-04	3.53E-05	2.24E-04	2.40E-06	3.53E-07	2.24E-06
HAP Total	**153.48**	**32.04**	**1414.78**	**7.67E-02**	**1.60E-02**	**7.07E-01**	**7.67E-04**	**1.60E-04**	**7.07E-03**

Worst case HAP = Manganese

Emission Factors supplied by manufacturer.

The metal oxyfuel/plasma cutting machine consists of one (1) plasma torch and two (2) oxyfuel torches. It has the ability to cut using one plasma torch, one oxyfuel torch, or two oxyfuel torches simultaneously. Potential emissions provided for the plasma cutting torch is the worst case scenario for this cutting machine.

Potential emissions based on assumption that each material is used 8,760 hours.

Controlled emissions based on cartridge filter control efficiency of 99.0 %