



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

September 28, 2004

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P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Hoosier Tank & Manufacturing, Inc / 141-19854-00554

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

### Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 of 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  
FN-REGIS.dot 9/16/03

September 28, 2004

Mr. William Welsch  
Hoosier Tank & Manufacturing, Inc.  
1710 Sheridan  
South Bend, IN 46628

Dear Mr. Welsch:

Re: Registered Construction and Operation Status,  
**141-19854-00554**

The application from Hoosier Tank & Manufacturing, Inc., received on August 23, 2004, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1, it has been determined that the following, to be located at 1710 Sheridan in South Bend, Indiana, 46628, is classified as registered:

One (1) metal pressure vessel manufacturing operation consisting of:

- (a) two (2) coating dip tanks, identified as DT01 and DT02, with emissions exhausted through Stacks DTV01 and DTV02,
- (b) three (3) 1.5 MMBtu/hr natural gas fired curing/drying ovens, identified as OV01, OV02, and OV03, with emissions exhausted through Stacks OVV01, OVV02, and OVV03,
- (c) one (1) airless surface coating spray booth, identified as SB01, with the particulate overspray emissions controlled by one (1) dry filter system, with all emissions exhausted through Stack SBV01,
- (d) one (1) welding area, consisting of six (6) MIG welding stations, identified as WE01 - WE06,
- (e) one (1) 0.85 MMBtu/hr natural gas fired boiler, identified as B01, with all emissions exhausted through Stack BV01, and
- (f) eight (8) 0.3 MMBtu/hr natural gas fired space heaters.

This registration is the first air approval issued to this source.

The following conditions apply to the proposed source:

- (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 forty percent (40%) 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.

- (2) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from Boiler B01 shall not exceed 0.6 pound per million Btu heat input (lb/MMBtu).
- (3) Pursuant to 326 IAC 6-3-2, the PM from airless spray booth SB01 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

- (4) Pursuant to 326 IAC 6-3-2(d), the particulate matter from airless spray booth SB01 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. Said control device shall be operated in accordance with the manufacturer's specifications. The requirement to operate the control is not federally enforceable.

If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall:

- (a) inspect the control device and do either of the following no later than four (4) hours after such observation:
- (1) repair the control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) operate the equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground; and
- (b) 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. Said records shall be maintained for a minimum of five (5) years.
- (5) Pursuant to 326 IAC 8-2-9(d)(4), the owner or operator shall not cause, allow, or permit, the discharge into the atmosphere of any volatile organic compounds from dip coater DT01, dip coater DT02, or airless spray booth SB01 in excess of three (3) pounds per gallon of coating, excluding water, delivered to a coating applicator.
- (6) Pursuant to 326 IAC 8-2-9(f), all solvent sprayed from all surface coating 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.

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

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

**Compliance Data Section  
Office of Air Quality  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, IN 46206-6015**

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

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

Sincerely,

Original Signed by

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

SDF

cc: File - St. Joseph County  
St. Joseph County Health Department  
Air Compliance - Rick Reynolds  
Northern Regional Office  
Permit Tracking  
Compliance Data Section

## Registration

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3).

<b>Company Name:</b>	Hoosier Tank & Manufacturing, Inc.
<b>Address:</b>	1710 Sheridan
<b>City:</b>	South Bend, Indiana 46628
<b>Authorized Individual:</b>	
<b>Phone Number:</b>	
<b>Registration Number:</b>	141-19854-00554

I hereby certify that Hoosier Tank & Manufacturing, Inc. is still in operation and is in compliance with the requirements of Registration 141-19854-00554.

<b>Name (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for Registered Status**

#### **Source Background and Description**

Source Name: Hoosier Tank & Manufacturing, Inc.  
Source Location: 1710 Sheridan, South Bend, Indiana 46628  
County: St. Joseph  
SIC Code: 3443  
Registration No.: 141-19854-00554  
Permit Reviewer: SDF

#### **Request**

The Office of Air Quality (OAQ) has reviewed an application from Hoosier Tank & Manufacturing, Inc. relating to proposed operation of a metal pressure vessel manufacturing operation consisting of:

- (a) two (2) coating dip tanks, identified as DT01 and DT02, with emissions exhausted through Stacks DTV01 and DTV02,
- (b) three (3) 1.5 MMBtu/hr natural gas fired curing/drying ovens, identified as OV01, OV02, and OV03, with emissions exhausted through Stacks OVV01, OVV02, and OVV03,
- (c) one (1) airless surface coating spray booth, identified as SB01, with the particulate overspray emissions controlled by one (1) dry filter system, with all emissions exhausted through Stack SBV01,
- (d) one (1) welding area, consisting of six (6) MIG welding stations, identified as WE01 - WE06,
- (e) one (1) 0.85 MMBtu/hr natural gas fired boiler, identified as B01, with all emissions exhausted through Stack BV01, and
- (f) eight (8) 0.3 MMBtu/hr natural gas fired space heaters.

The PM and PM10 emissions are greater than their respective 326 IAC 2-5.1-2(a) low end applicable level of 5 tons per year, but less than their respective 326 IAC 2-5.1-2(a) upper end applicable level of 25 tons per year. Therefore, the proposed source shall be permitted via a registration pursuant to 326 IAC 2-5.1.

#### **Existing Approvals**

This approval will be the first source approval.

#### **Recommendation**

The staff recommends to the Commissioner that the Registration 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.

### Emission Calculations

The emissions generated by this proposed source are PM, PM10, and VOC emissions from the airless spray booth, VOC emissions from the coating dip tanks, PM, PM10, and HAP emissions from the welding stations, and natural gas combustion emissions from the curing/drying ovens, boiler, and space heaters. The following calculations determine the unrestricted potential to emit (UPTE) and the emissions after controls.

(a) Unrestricted Potential to Emit (UPTE):

(1) Airless Spray Booth:

The following calculations determine the unrestricted emissions from the airless booth based on the material properties obtained from the worst case Material Safety Data Sheets (MSDS), a transfer efficiency of 85%, emissions before controls, and 8760 hours of operation.

The airless booth coating does not contain any regulated hazardous air pollutants (HAP).

PM/PM10:

$$\text{lb/gal} * \text{gal/unit} * \text{unit/hr} * (1 - \text{wt fraction volatiles}) * (1 - \text{fraction transfer}) * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \text{tons PM/yr}$$

	Coating	lb/gal	gal/unit	unit/hr	wt fraction volatiles	fraction transfer	tons PM/yr	tons PM10/yr*
Airless Booth	N-7903	9.85	0.04	20	0.0395	0.85	4.97	4.97

\* PM10 is determined to be equal to PM

VOC:

$$\text{lb/gal} * \text{gal/unit} * \text{unit/hr} * \text{fraction VOC} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \text{tons VOC/yr}$$

Tank	Coating	lb/gal	gal/unit	unit/hr	fraction VOC	tons VOC/yr
Airless Booth	N-7903	9.85	0.04	20	0.019	0.66

(2) Coating Dip Tanks:

The following calculations determine the unrestricted emissions from the coating dip tanks based on the material properties obtained from the worst case Material Safety Data Sheets (MSDS), emissions before controls, and 8760 hours of operation.

The transfer efficiency of dip coating processes is determined to be 100%. Therefore, there are no PM/PM10 emissions associated with the proposed tanks.

The dip tank coating does not contain any regulated hazardous air pollutants (HAP).

$$\text{lb/gal} * \text{gal/unit} * \text{unit/hr} * \text{fraction VOC} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \text{tons VOC/yr}$$

Tank	Coating	lb/gal	gal/unit	unit/hr	fraction VOC	tons VOC/yr
DT01	N-7903	9.85	0.04	130	0.019	4.26
DT02	N-7903	9.85	0.04	130	0.019	4.26
Total						8.52

(3) Curing/Drying Ovens:

The following calculations determine the unrestricted combustion emissions from the ovens based on natural gas combustion, a combined maximum capacity of 4.5 MMBtu/hr, AP-42 emission factors, emissions before controls, and 8760 hours of operation.

$$4.5 \text{ MMBtu/hr} * 1/1 \text{ MMCF/MMBtu} * \text{lb/MMCF} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \text{tons/yr}$$

	PM 1.9 lb/mmcF	PM10 7.6 lb/mmcF	SO2 0.6 lb/mmcF	NOx 100 lb/mmcF	VOC 5.5 lb/mmcF	CO 84 lb/mmcF
tons/yr	neg.	0.1	neg.	2.0	0.1	1.7

Worst case Single HAP (tons/yr)	Combined HAP (tons/yr)
0.04	0.04

(4) Welding Stations:

The following calculations determine the welding area unrestricted emissions based on 6 stations, a maximum wire consumption rate of 2.65 lb/hr per station, AP-42 emission factors, emissions before controls, and 8760 hours of operation.

$$6 \text{ stations} * 2.65 \text{ lb wire/hr station} * \text{lb poll/lb electrode} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \text{tons/yr}$$

	PM 0.01 lb poll/lb wire	PM10* 0.01 lb poll/lb wire	Mn 0.001lb poll/lb wire
tons/yr	0.70	0.70	0.07

\* PM10 is determined to be equal to PM in this case.

(5) Boiler:

The following calculations determine the unrestricted combustion emissions from the boiler based on natural gas combustion, a maximum capacity of 0.85 MMBtu/hr, AP-42 emission factors, emissions before controls, and 8760 hours of operation.

$$0.85 \text{ MMBtu/hr} * 1/1000 \text{ MCF/MMBtu} * \text{lb/MCF} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \text{tons/yr}$$

	PM 1.9 lb/mmcF	PM10 7.6 lb/mmcF	SO2 0.6 lb/mmcF	NOx 100 lb/mmcF	VOC 5.5 lb/mmcF	CO 84 lb/mmcF
tons/yr	neg.	neg.	neg.	0.4	neg.	0.3

Worst case Single HAP (tons/yr)	Combined HAP (tons/yr)
0.01	0.01

(6) Space Heaters:

The following calculations determine the unrestricted combustion emissions from the space heaters based on natural gas combustion, a maximum combined capacity of 2.4 MMBtu/hr, AP-42 emission factors, emissions before controls, and 8760 hours of operation.

$$2.4 \text{ MMBtu/hr} * 1/1000 \text{ MCF/MMBtu} * \text{lb/MCF} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = \text{tons/yr}$$

	PM 1.9 lb/mmcF	PM10 7.6 lb/mmcF	SO2 0.6 lb/mmcF	NOx 100 lb/mmcF	VOC 5.5 lb/mmcF	CO 84 lb/mmcF
tons/yr	neg.	0.10	neg.	1.10	0.10	0.90

Worst case Single HAP (tons/yr)	Combined HAP (tons/yr)
0.02	0.02

(7) Sum Total Unrestricted Potential Emissions:

	PM	PM10	SO2	NOx	VOC	CO	Single HAP	Combined HAP
airless booth	4.97	4.97	-	-	0.66	-	-	-
dip tanks 1 & 2	-	-	-	-	8.52	-	-	-
curing/drying ovens 1, 2, & 3	neg.	0.10	neg.	2.00	0.10	1.70	0.04	0.04
welding area	0.70	0.70	-	-	-	-	0.07	0.07
boiler	neg.	neg.	neg.	0.40	neg.	0.30	0.01	0.01
space heaters	neg.	0.10	neg.	1.10	0.10	0.90	0.02	0.02
Total	5.67	5.87	neg.	3.50	9.38	2.90	0.14	0.14

(b) Emissions After Controls:

The airless booth PM and PM10 emissions are controlled. The following calculations determine the airless booth PM and PM10 emissions based on the estimated emissions before controls and an overall control efficiency of 97%.

$$\begin{aligned} \text{PM: } & 4.97 \text{ tons PM/yr} * (1 - 0.97) & = & 0.15 \text{ tons PM/yr} \\ \text{PM10: } & 4.97 \text{ tons PM10/yr} * (1 - 0.97) & = & 0.15 \text{ tons PM10/yr} \end{aligned}$$

All other source emissions are uncontrolled. Therefore, the emissions after controls equal the estimated emissions before controls.

The following table lists the estimated emissions after controls.

	PM	PM10	SO2	NOx	VOC	CO	Single HAP	Combined HAP
airless booth	0.15	0.15	-	-	0.66	-	-	-
dip tanks 1 & 2	-	-	-	-	8.52	-	-	-
curing/drying ovens 1, 2, & 3	neg.	0.10	neg.	2.00	0.10	1.70	0.04	0.04
welding area	0.70	0.70	-	-	-	-	0.07	0.07
boiler	neg.	neg.	neg.	0.40	neg.	0.30	0.01	0.01
space heaters	neg.	0.10	neg.	1.10	0.10	0.90	0.02	0.02
Total	0.85	1.05	neg.	3.50	9.38	2.90	0.14	0.14

**Potential To Emit**

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.”

This table reflects the source UPTE before controls based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	5.67
PM-10	5.87
SO <sub>2</sub>	neg.
VOC	9.38
CO	2.90
NOx	3.50

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

Pollutant	Potential To Emit (tons/year)
Total Combined haps	0.14

The PM and PM10 emissions are greater than their respective 326 IAC 2-5.1-2(a) low end applicable level of 5 tons per year, but less than their respective 326 IAC 2-5.1-2(a) upper end applicable level of 25 tons per year. Therefore, the proposed source shall be permitted via a registration pursuant to 326 IAC 2-5.1.

**County Attainment Status**

The source is located in St. Joseph County.

Pollutant	Status
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
1-hour Ozone	attainment
8-hour Ozone	nonattainment
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. VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) St. Joseph County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Source Emissions After Application of All Limits and Standards**

New 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)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
New Source	0.85	1.05	neg.	3.50	9.38	2.90	0.14	0.14
PSD Major Levels	250	250	250	250	100	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) This new source is not a major PSD stationary source because no regulated pollutant is emitted at a rate greater than or equal to its applicable major source level and it is not one of the 28 listed source categories.
- (b) This new source is not a Title V major stationary source because no criteria pollutant emissions exceed their applicable major source level of 100 tons per year and the single and combined HAP emissions do not exceed their respective applicable levels of 10 and 25 tons per year.

**Federal Rule Applicability**

- (a) New Source Performance Standards (NSPS):

There are no NSPS (40 CFR 60) that apply to the proposed source.

(b) National Emission Standards for Hazardous Air Pollutants (NESHAP):

40 CFR 63, Subpart M, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, does not apply to the metal product surface coating units because the source is not a major source for HAPs as stated in 63.3881(b).

**State Rule Applicability - Entire Source**

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

This new source is not a major PSD stationary source because no regulated pollutant is emitted at a rate greater than or equal to its applicable major source level and it is not one of the 28 listed source categories.

326 IAC 2-4.1 (HAP Major Sources)

This new source is not subject to the requirements of 326 IAC 2-4.1 because no single hazardous air pollutant (HAP) emissions exceed 10 tons per year, and the combined HAP emissions are less than 25 tons per year.

326 IAC 5-1-2 (Opacity Limitations)

Opacity shall not exceed an average of 40% in any one 6 minute averaging period. Opacity shall not exceed 60% for more than a cumulative total of fifteen minutes.

**State Rule Applicability - Individual Facilities**

326 IAC 6-2-4 (Particulate Matter Limitations for Sources of Indirect Heating):

326 IAC 6-2-4 applies to source of indirect heating.

The Office of Air Quality has determined that the boiler is a source of indirect heating. Therefore, the requirements of 326 IAC 6-2-4 apply.

Pursuant to 326 IAC 6-2-4(a) particulate emissions from indirect heating facilities constructed after September 21, 1983 shall be limited by the following equation:

$$PT = 1.09/Q^{0.26} = 1.09/(0.85 \text{ MMBtu/hr})^{0.26} = 1.14 \text{ lb PM/MMBtu}$$

where: Pt = limit (lb PM/MMBtu)

Q = total source maximum operating capacity in MMBtu/hr (0.85 MMBtu/hr); and

The allowable rate using the equation is determined to be 1.14 lb PM/MMBtu.

However, 326 IAC 6-2-4(a) also states that for boilers with a capacity less than 10 MMBtu/hr, the allowable rate shall not exceed 0.6 lb PM/MMBtu.

Therefore, the PM emissions from the boiler (capacity = 0.85 MMBtu/hr) shall be limited to 0.6 lb/MMBtu.

The PM emissions from the boiler are estimated to be 0.002 lb/MMBtu which is less than the 326 IAC 6-2-4 limit of 0.6 lb/MMBtu.

$$1.9 \text{ lb PM/MMcf} * 1 \text{ MMcf}/1000 \text{ MMBtu} = 0.002 \text{ lb PM/MMBtu}$$

Therefore, compliance is expected.

326 IAC 6-3 (Particulate Matter Limitations):

(a) Dip Tanks:

The requirements of 326 IAC 6-3-2 do not apply to the dip tanks because pursuant to 326 IAC 6-3-1(b)(5), dip coaters are exempted from the requirements of 326 IAC 6-3-2.

(b) MIG Welders:

Pursuant to 326 IAC 6-3-1(b)(9), welding processes that use less than six hundred twenty-five (625) pounds of rod or wire per day are exempt from the requirements of this rule.

Based on 6 stations and 2.65 lb wire/ hr station, the daily maximum electrode consumption rate is determined to be 381.60 lb/day which is less than the applicable level of 625 lb/day.

$$6 \text{ stations} * 2.65 \text{ lb wire/hr station} * 24 \text{ hr/day} = 381.60 \text{ lb/day}$$

Therefore, the welders are not subject to the requirements of 326 IAC 6-3-2.

(c) Airless Spray Booth:

The airless spray booth is subject to the requirements of 326 IAC 6-3-2. This rule is applicable pursuant to 40 CFR 52, Subpart P.

The PM from airless spray booth SB01 shall not exceed the pound per hour emission rate established as E in the following formula:

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

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

Pursuant to 326 IAC 6-3-2(d), the particulate matter from airless spray booth SB01 shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. Said control device shall be operated in accordance with the manufacturer's specifications. The requirement to operate the control is not federally enforceable.

If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall:

(a) inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) repair the control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) operate the equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground; and

- (b) 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. Said records shall be maintained for a minimum of five (5) years.

326 IAC 8-2-9 (VOC, Miscellaneous Metal Parts Coating Operations):

The dip coaters and airless spray booth are subject to the requirements of 326 IAC 8-2-9 because these coating units apply coating to metal parts and products, the SIC code is 3443, one of the applicable SIC codes listed in 326 IAC 8-2-9(a)(5), and are not any of the exempted units listed in 326 IAC 8-2-9(b).

The coatings applied are not clear coats, coatings that are air dried or forced warm dried at temperatures up to 194 degrees fahrenheit, or extreme performance coatings.

Therefore, the coatings are determined to be coatings of the type listed in 326 IAC 8-2-9(d)(4).

Pursuant to 326 IAC 8-2-9(d)(4), the owner or operator shall not cause, allow, or permit, the discharge into the atmosphere of any volatile organic compounds in excess of three (3) pounds per gallon of coating, excluding water, delivered to a coating applicator.

The only coating applied at the dip coaters and airless spray booth is coating N-7903. The VOC content is determined to be 2.49 pounds of VOC per gallon coating, excluding water. Therefore compliance with this limit is expected.

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

326 IAC 8-1-6 (State Best Available Control Technology Requirements):

The requirements of 326 IAC 8-1-6 do not apply to the surface coating units because pursuant to 326 IAC 8-1-6, this rule only applies if the affected units are not otherwise regulated by other provisions of 326 IAC 8.

The dip coaters and airless spray booth are subject to the requirements of 326 IAC 8-2-9.

**Conclusion**

The Permittee shall operate the proposed pressure vessel manufacturing operation according to the requirements specified in Registration 141-19854-00554.