



TO: Interested Parties / Applicant

RE: Yardarm Marine Products, Inc. / Registration 097-19991-00552

FROM: Felicia A. Robinson  
Administrator  
Office of Environmental Services

## 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 Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



Air Quality Hotline: 317-327-4AIR | [knozone.com](http://knozone.com)

Department of Public Works  
Office of Environmental Services

2700 Belmont Avenue  
Indianapolis, IN 46221

317-327-2234  
Fax 327-2274  
TDD 327-5186  
[indygov.org/dpw](http://indygov.org/dpw)



July 10, 2006

Ms. Pamela Delk  
Yardarm Marine Products, Incorporated  
5701 Elmwood Avenue, Suite B  
Indianapolis, IN 46203

CERTIFIED MAIL 7000 0600 0023 5187 1608

Re: Registered Construction and Operation Status,  
**097-19991-00552**

Dear Ms. Delk:

The application from Yardarm Marine Products, Incorporated, received on December 17, 2004, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following metal fabricating process, located at 5701 Elmwood Avenue, Suite B, Indianapolis, IN, is classified as registered:

- (a) One (1) paint booth, manufactured by Cincinnati Fan, identified as emission unit PB1, utilizing airless spray application method, with maximum capacity to surface coat one and one-half (1.5) fabricated metal units per hour and two tenths (0.2) gallons of coating per unit, equipped with dry filters for overspray control and exhausting to one (1) stack, identified as PB1-V1. Installed prior to 2004.
- (b) Four (4) Metal Inert Gas (MIG) welding stations, identified as emission unit MIG welding, with maximum consumption of wire per station of eighty three hundredths (0.83) pounds per hour, exhausting inside the building. Installed prior to 2004.

The following conditions shall be applicable:

- (a) 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:
  - (1) 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.
  - (2) 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.
- (b) Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), particulate from the one (1) paint booth, identified as emission unit PB1, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, 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:

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



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- (2) 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.

- (c) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), the volatile organic compound (VOC) content of each coating delivered to the applicator at Paint Booth, PB1 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried and forced warm air dried coatings.

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.

To document compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coating), the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained shall be taken daily and shall be complete and sufficient to establish compliance with the VOC coating content limits established in 326 IAC 8-2-9 (Miscellaneous Metal Coating).

- (1) The VOC content of each coating material and solvent used.
- (2) The amount of coating material and solvent used less water 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 solvents.

This Registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

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

Compliance Data Section  
Office of Air Quality  
100 North Senate Avenue  
Indianapolis, IN 46204-2251

and

Indianapolis Office of Environmental Services  
Air Compliance  
2700 S. Belmont Avenue  
Indianapolis, IN 46221

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

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

Sincerely,

ORIGINAL SIGNED BY

Felicia A. Robinson  
Administrator

MBC

cc: File  
Air Compliance – Matt Mosier  
Enforcement – Cheryl Carlson  
IDEM, OAQ – Mindy Hahn  
Marion County Health Department

<b>Registration Annual Notification</b>
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This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3).

<b>Company Name:</b>	<b>Yardarm Marine Products, Incorporated</b>
<b>Address:</b>	<b>5701 Elmwood Avenue, Suite B</b>
<b>City:</b>	<b>Indianapolis</b>
<b>Authorized individual:</b>	<b>Pamela Delk</b>
<b>Phone #:</b>	<b>(317) 780-2020</b>
<b>Registration #:</b>	<b>097-19991-00552</b>

I hereby certify that Yardarm Marine Products, Incorporated is still in operation and is in compliance with the requirements of Registration **097-19991-00552**.

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

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

Technical Support Document (TSD) for a Registration

**Source Background and Description**

<b>Source Name:</b>	<b>Yardarm Marine Products, Incorporated</b>
<b>Source Location:</b>	<b>5701 Elmwood Avenue, Suite B, Indianapolis, IN 46203</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>3441</b>
<b>Operation Permit No.:</b>	<b>097-19991-00552</b>
<b>Permit Reviewer:</b>	<b>M. Caraher</b>

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed an application from Yardarm Marine Products, Incorporated relating to the operation of an establishment primarily engaged in fabricating iron, steel or other metal for structural purposes, including metal floor jacks.

**Unpermitted Emission Units and Pollution Control Equipment**

The source consists of the following unpermitted emission units:

- (a) One (1) paint booth, manufactured by Cincinnati Fan, identified as emission unit PB1, utilizing airless spray application method, with maximum capacity to surface coat one and one-half (1.5) fabricated metal units per hour and two tenths (0.2) gallons of coating per unit, equipped with dry filters for overspray control and exhausting to one (1) stack, identified as PB1-V1. Installed prior to 2004.
- (b) Four (4) Metal Inert Gas (MIG) welding stations, identified as emission unit MIG welding, with maximum consumption of wire per station of eighty three hundredths (0.83) pounds per hour, exhausting inside the building. Installed prior to 2004.

**Enforcement Issue**

- (a) IDEM, OAQ, and OES are aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment". IDEM, OAQ, and OES are reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

**Stack Summary**

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
PB1-V1	Paint Booth	24.0	3.5	25900	ambient

## Recommendation

The staff recommends to the Administrator 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 and additional information submitted by the applicant.

An application for the purposes of this review was received on December 17, 2004, with additional information received on June 15, 2005 and May 15, 2006.

## Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 4 of 4).

## 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	8.26
PM-10	8.26
SO <sub>2</sub>	Negligible
VOC	4.12
CO	Negligible
NO <sub>x</sub>	Negligible

HAPs	Potential to Emit (tons/yr)
Ethylbenzene	0.54
Xylene	2.95
Cobalt Compounds	0.03
Combined HAP	3.52

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than twenty five (25) tons per year. The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM and PM-10 are each greater than five (5) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.5. A Registration will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) 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	Unclassifiable
PM2.5	Nonattainment
SO <sub>2</sub>	Maintenance attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Maintenance attainment
8-hour Ozone	Basic nonattainment
CO	Attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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<sub>x</sub> 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<sub>x</sub> emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions, pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.
- (c) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) 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 PSD, Emission Offset, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	8.26
PM-10	8.26
SO <sub>2</sub>	Negligible
VOC	4.12
CO	Negligible
NO <sub>x</sub>	Negligible
Highest Single HAP	2.95
Combination HAPs	3.52

- (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.
- (c) These emissions were based on the application submitted by the source.

### **Part 70 Permit Determination**

#### 326 IAC 2-7 (Part 70 Permit Program)

This source, which has constructed and operated without a permit, 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 is the first air approval issued to this 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) included in this permit.

### **State Rule Applicability – Entire Source**

#### 326 IAC 2-1.1-5 (Air Quality Requirements)

Marion County has been designated as nonattainment for PM2.5. According to an EPA guidance memo dated April 5, 2005, PM-10 is to be utilized as a surrogate for PM2.5 until the EPA can promulgate the PM2.5 implementation rule. PM-10 emissions, and therefore PM2.5 emissions, from this source are less than one hundred (100) tons per twelve consecutive month period. There have been no modifications to this source such that it is a major source of PM-10 emissions. Therefore, this source is not subject to nonattainment new source review requirements for PM2.5 emissions.

#### 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) and 326 IAC 2-3 (Emission Offset)

This source is not a major stationary source because no attainment regulated pollutant emissions are equal to or greater than two hundred fifty (250) tons per year, this source is not one of the 28 listed source categories under 326 IAC 2-2 or 326 IAC 2-3, and no attainment or non-attainment regulated pollutant emissions are equal to or greater than one hundred (100) tons per year. There have been no modifications or revisions to this source that were major modifications pursuant to 326 IAC 2-2 or 326 IAC 2-3. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset) are each not applicable to this source.

#### 326 IAC 2-4.1 (New Source Toxics Control)

This existing source commenced operation after July 27, 1997 but does not have the potential to emit any single hazardous air pollutant (HAP) equal to or greater than ten (10) tons per year nor does this source have the potential to emit HAP of equal to or greater than twenty-five (25) tons per year for any combination of HAP. This source did not undergo construction or reconstruction of

a major HAP source after July 27, 1997. Therefore, this source is not subject to 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants).

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 a Registration, 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.

326 IAC 4-2 (Incinerators)

This source does not have an incinerator. Therefore, this source is not subject to 326 IAC 4-2 (Incinerators).

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.

326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County) and 326 IAC 6.5-6 (Marion County)

This source has the potential to emit particulate of less than one hundred (100) tons per year and has actual emissions less than ten (10) tons per year. Yardarm Marine Products, Incorporated is not specifically identified in 326 IAC 6.5-6 (Marion County). Therefore, 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County) and 326 IAC 6.5-6 (Marion County) each do not apply to this source.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

This source does not have any emission unit(s) that combust fuel for indirect heating. Therefore, 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) does not apply to this source.

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

See discussion under State Rule Applicability – Individual Facilities of this Technical Support Document.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to the provisions of 326 IAC 6-4 for fugitive dust emissions. 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).

326 IAC 6-5 (Fugitive Particulate Matter Emissions)

This source, which has not received all the necessary preconstruction approvals before December 13, 1985, does not have potential fugitive particulate matter emissions. Therefore, this source is not subject to 326 IAC 6-5 (Fugitive Particulate Matter Emissions).

326 IAC 7 (Sulfur Dioxide Rules)

No emission unit at this source has the potential to emit twenty five (25) tons per year or ten (10) pounds per hour of sulfur dioxide (SO<sub>2</sub>). Therefore, this source is not subject to 326 IAC 7 (Sulfur Dioxide Rules).

326 IAC 7-4-2 (Marion County Sulfur Dioxide Emission Limitations)

Neither the source or any specific emission unit at this source is specifically identified in 326 IAC 7-4-2. Therefore, 326 IAC 7-4-2 (Marion County Sulfur Dioxide Emission Limitations) does not apply to this source.

326 IAC 8 (Volatile Organic Compound Rules)

See discussion under State Rule Applicability – Individual Facilities of this Technical Support Document.

326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities)

This source does not have any emission unit, otherwise regulated by other provisions of 326 IAC 8, with the potential to emit twenty-five (25) tons or more per year of volatile organic compounds (VOC) (see Appendix A page 1 through 4 of 4). Therefore, 326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities) does not apply to Yardarm Marine Products.

326 IAC 9 (Carbon Monoxide Emission Rules)

There are no provisions under 326 IAC 9 (Carbon Monoxide Emission Rules) applicable to any specific emission unit or operation at this source. Therefore, this source is not subject to 326 IAC 9 (Carbon Monoxide Emission Rules).

326 IAC 10 (Nitrogen Oxide Rules)

There are no provisions under 326 IAC 10 (Nitrogen Oxide Rules) applicable to any specific emission unit or operation at this source. This source has not opted in to 326 IAC 10 (Nitrogen Oxide Rules). Therefore, this source is not subject to 326 IAC 10 (Nitrogen Oxide Rules).

326 IAC 11 (Emission Limitations for Specific Types of Operations)

This metal fabricating operation does not perform any specific type of operation identified in 326 IAC 11 (Emission Limitations for Specific Types of Operations). Therefore, this source is not subject to 326 IAC 11 (Emission Limitations for Specific Types of Operations).

326 IAC 12 (New Source Performance Standards)

See discussion under Federal Rule Applicability of this Technical Support Document.

326 IAC 14 (Emission Standards for Hazardous Air Pollutants)

There are no provisions under 326 IAC 14 (Emission Standards for Hazardous Air Pollutants) and 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants) applicable to any specific emission unit or operation at this source. Therefore, this source is not subject to the provisions of 326 IAC 14 (Emission Standards for Hazardous Air Pollutants) and 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).

326 IAC 15 (Lead Rules)

Yardarm Marine Products, Inc. is not specifically identified in 326 IAC 15 (Lead Rules) and there are no provisions under 326 IAC 15 (Lead Rules) applicable to any specific emission unit or operation at this source. Therefore, this source is not subject to 326 IAC 15 (Lead Rules).

326 IAC 17 (Public Records; Confidential Information; Confidentiality Agreements)

Yardarm Marine Products, Inc. has not filed or claimed any application, source or permit information for this review and Registration, 097-19991-00552, as confidential, pursuant to 326 IAC 17-1-6 (Public Records: Confidentiality Claims).

**326 IAC 20 (Hazardous Air Pollutants)**

Yardarm Marine Products, Inc. is not a major source of hazardous air pollutants (HAP) and does not perform operations specifically identified in 326 IAC 20. Therefore, this source is not subject to 326 IAC 20 (Hazardous Air Pollutants).

**326 IAC 21 (Acid Deposition Control)**

Yardarm Marine Products, Inc. is not subject to the Acid Rain Program Provisions of Title IV of the 1990 Clean Air Act Amendments as listed in 40 CFR Part 72 through 78 and is, therefore, not subject to 326 IAC 21 (Acid Deposition Control).

**State Rule Applicability – Individual Facilities**

Paint Booth, PB1

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

Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) paint booth, identified as emission unit PB1, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, 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:

- (a) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (b) 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 Booth, PB1, has potential VOC emissions that exceed fifteen (15) pounds per day (see TSD Appendix A page 2 of 4). 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 Paint Booth, PB1 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried and forced warm air dried coatings.

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.

To document compliance with 326 IAC 8-2-9 (Miscellaneous Metal Coating), the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained shall be taken daily and shall be complete and sufficient to establish compliance with the VOC coating content limits established in 326 IAC 8-2-9 (Miscellaneous Metal Coating).

- (1) The VOC content of each coating material and solvent used.
- (2) The amount of coating material and solvent used less water 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 solvents.

Based on the MSDS submitted by the source and calculations made, Yardarm Marine Products, Inc. worst case VOC content coating, as applied, demonstrates compliance (see TSD Appendix A page 2 of 4) with 326 IAC 8-2-9 (Miscellaneous Metal Coating).

#### Four (4) MIG Welding Stations

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

Pursuant to 326 IAC 6-3-1(a)(9), welding operations that consume less than 625 pounds of rod or wire per day are exempt from the requirements of 326 IAC 6-3. The maximum consumption of wire per station is 0.83 pounds per hour ( $4 \times 0.83$  pounds per hour  $\times 24$  hours per day = 79.7 pounds per day). Therefore, 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) does not apply to the four (4) MIG welding stations.

#### **Conclusion**

The operation of this establishment primarily engaged in fabricating iron, steel or other metal for structural purposes, including metal floor jacks shall be subject to the conditions of Registration **097-19991-00552**.

**Appendix A: Emissions Calculations**  
**Surface Coating - Paint, as supplied / applied**

**Company Name:** Yardarm Marine Products, Inc.  
**Address City IN Zip:** 5701 Elmwood Avenue, Suite B, Indpls., IN 46203  
**Permit Number:** 097-19991-00552  
**Plt ID:** 097-00552  
**Reviewer:** M. Caraher  
**Date:** May 18, 2006

	Coating (as supplied)	Thinner (Acetone)	Coating (as applied - see calculations)
Density	10.21	6.6	10.05
VOC Content (wt %)	32.2	0.0	31.2
Water Content (%)	0.0	0.0	0.0
VOC Content, less water (wt %)	32.2	0.0	31.2
Volatile by volume (%)	45.0	0.0	47.6
Volume % solids	55.0	0.0	52.4
Paint/thinner mix (gallons)	1.0	0.05	95.3% / 4.8% as applied

Density of Coating as applied =  $10.21(0.953) + 6.6(0.048) = 10.05$  lbs coat/gal coat

VOC Content wt % as applied =  $[(10.21)(0.322) + (6.6)(0.0)] / [(10.21) + (6.6)(0.048)] = 0.312$  lb VOC/lb coat  
or 31.2%

Volume % solids as applied=  $(0.55)/1 + \text{dilution ratio} \times 100 = 52.40\%$

Volatile by volume % as applied=  $100 - \text{Volume \% solids} = 47.60\%$

**Methodology**

Coating information and paint/thinner mix ratio supplied by Yardarm Marine

Calculations from IDEM, OAQ Form W-4 instructions for surface coating calculations



**Appendix A: Emission Calculations  
HAP Emission Calculations**

**Company Name:** Yardarm Marine Products, Inc.  
**Address City IN Zip:** 5701 Elmwood Avenue, Suite B, Indpls., IN 46203  
**Permit Number:** 097-19991-00552  
**Plt ID:** 097-00552  
**Permit Reviewer:** M. Caraher  
**Date:** May 18, 2006

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Weight % Xylene	Weight % Cobalt Compounds	Ethylbenzene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Cobalt Compound Emissions (ton/yr)	Combined HAP Emissions (ton/yr)	
Gloss Black Enamel	10.21	0.20	1.50	4.00%	22.00%	0.20%	0.54	2.95	0.03		
as applied	10.05	0.20	1.50	4.00%	22.00%	0.20%	0.53	2.91	0.03		
				0.00%	0.00%	0.00%	0.00	0.00	0.00		
Total State Potential to Emit, worst case coating							<b>Highest Single HAP</b>	<b>0.54</b>	<b>2.95</b>	<b>0.03</b>	<b>3.51</b>

**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

Weight % HAP for as applied:

- 1) VOC/HAP content wt % (as applied) - VOC/HAP content wt% (as supplied) = total contribution of VOC/HAP content wt % from thinnner
- 2) [(wt % VOC/HAP x wt % individual HAP x density of coating) / density of coating] x 100 = wt % individual HAP

**Appendix A: Emissions Calculations  
Welding and Thermal Cutting**

**Company Name:** Yardarm Marine Products, Inc.  
**Address City IN Zip:** 5701 Elmwood Avenue, Suite B, Indpls., IN 46201  
**Permit Number:** 097-19991-00552  
**Pit ID:** 097-00552  
**Reviewer:** M. Caraher  
**Date:** May 18, 2006

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
<b>WELDING</b>												
Submerged Arc	0	0		0.036	0.011			0.000	0.000	0.000	0	0.000
Metal Inert Gas (MIG)(carbon steel)	4	0.83		0.0055	0.0005			0.018	0.002	0.000	0	0.002
Stick (E7018 electrode)	0	0		0.0211	0.0009			0.000	0.000	0.000	0	0.000
Tungsten Inert Gas (TIG)(carbon steel)	0	0		0.0055	0.0005			0.000	0.000	0.000	0	0.000
Oxyacetylene(carbon steel)	0	0		0.0055	0.0005			0.000	0.000	0.000	0	0.000
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	0	0	0	0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000	0.000
Oxymethane	0	0	0	0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**	0	0	0	0.0039				0.000	0.000	0.000	0.000	0.000
<b>EMISSION TOTALS</b>												
Potential Emissions lbs/hr								0.02				0.00
Potential Emissions lbs/day								0.44				0.04
Potential Emissions tons/year								0.08				0.01

**METHODOLOGY**

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick  
 Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)  
 Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)  
 Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)  
 Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day  
 Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs