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: January 12, 2005

RE: Roll Forming Corporation / 019-20332-00114

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 1/10/05

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January 12, 2005

Ms. Stephanie Pike
Roll Forming Corporation
1205 North Access Road
Jeffersonville, IN 47130

Re: Registered Construction and Operation Status,
019-20332-00114

Dear Ms. Pike:

The application from Roll Forming Corporation, received on November 3, 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 stationary metal parts manufacturing plant, to be located at 1205 North Access Road, Jeffersonville, IN 47130 is classified as registered:

(a) One (1) metal inert gas (MIG) welding station on process line 5443, designated as Unit 1, constructed in the Spring of 2003, with a maximum capacity of 23,803 tons of rolled steel per year and a maximum annual wire usage rate of 392.8 pounds of wire per year (GMAW Wire Types E70S-3, ER70S-6, and ER80S-D2);

(b) One (1) Dritech mechanical cut-off saw on process line 5443, constructed in the Spring of 2003, where an cutting coolant continuously floods the machining interface, with a maximum capacity of 23,803 tons of rolled steel per year;

(c) One (1) Vac-U-Paint surface coating system on process line 5443, designated as Unit 3, constructed in the Spring of 2003, that applies paint to metal parts using an air atomizing spray coater, with a maximum capacity of 23,803 tons of rolled steel per year and 71 tons of paint per year, with a paint transfer efficiency of 95%, with overspray controlled by vacuum extraction though template openings, and with extracted air filtered then exhausted through Stack 1;

(d) One (1) natural gas-fired heater on process line 5443, designated as Unit 6, constructed in the Spring of 2003, rated at 0.22 MMBtu/hr, exhausting to Stack 3; and

(e) One (1) natural gas-fired paint dryer on process line 5443, designated as Unit 4, constructed in the Spring of 2003, rated at 1.5 MMBtu/hr, exhausting to Stack 2;

(f) One (1) tungsten inert gas (TIG) welding station (nonconsumable) on process line 5410, designated as Unit 2, constructed in the Spring of 2003, with a maximum capacity of 32,861 tons of rolled steel per year;

(g) One (1) natural gas-fired heater associated with the regalvanizing spray unit on process line 5410, designated as Unit 5, constructed in August 2004, rated at with 0.22 MMBtu/hr, exhausting to Stack 4;

(h) One (1) wire brush unit associated with the regalvanizing spray unit on process line 5410 for smoothing of metal part surfaces following regalvanization, designated as Unit 5, constructed in August 2004, with a maximum capacity of 32,861 tons of rolled steel per year;

(i) One (1) rust preventative spray unit on process line 5410, using 4.6 gallons of hydrocarbon solvent per day, constructed in 2003, with a maximum capacity of 32,861 tons of rolled steel per year;

(j) One (1) Dreistern hydraulic cut-off unit on process line 5410, constructed in 2003, with a maximum capacity of 32,861 tons of rolled steel per year, utilizing a cutting oil for lubrication;

(k) One (1) cold cleaning degreaser used to perform non-halogenated organic solvent degreasing (mineral spirits) of parts and/or tools in process line 5410, constructed in 2003, utilizing 23 gallons of solvent per year. The cold cleaner is an offline system, batch type, which uses immersion, and is equipped with drain and remote reservoir with insignificant exposure to outside air; and

(l) Insignificant activities associated with use of lubricating oils, hydraulic oils, machining oils, and/or machining fluids (including coolants) associated with process lines 5443 and 5410;

(m) One (1) rolled steel regalvanizing spray unit on process line 5410, constructed in August 2004, where zinc is applied to rolled steel by galvanization at a maximum throughput 32,861 tons of steel per year, using zinc wire at a maximum usage rate of 8,215 pounds of zinc wire per year, and with a conservative transfer efficiency of 35%. To galvanize the rolled steel product, zinc wire (99.9% elemental zinc) is run through an oxygen and acetylene torch, melted, and then blown onto the steel surface.

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) in a six (6) hour period 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 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate from the Vac-U-Paint surface coating system on process line 5443 shall be controlled by 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 an observation:

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

(2) Operate equipment so that no overspray is visible 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 (Volatile Organic Compounds; Surface Coating Emission Limitations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds per gallon of coating, excluding water, delivered to a coating applicator, in a coating application system that is air dried.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(d) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Permittee shall:

(1) Equip the cleaner with a cover;

(2) Equip the cleaner with a facility for draining cleaned parts;

(3) Close the degreaser cover whenever parts are not being handled in the cleaner;

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) Provide a permanent, conspicuous label summarizing the operation requirements;

(6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

(e) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the regalvanization spray unit shall be 9.94 pounds per hour, based upon a maximum process weight rate of 32,861 tons of steel per year (3.75 tons per hour). The allowable rate of emission can be calculated as follows:

Interpolation of the data in the table in 326 IAC 6-3-2(e)(2) for the process weight rates 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

(f) Any change or modification that will result in an increase in the actual emissions of Volatile Organic Compounds (VOCs) from the Vac-U-Paint surface coating system to greater than fifteen (15) pounds per day before add-on controls shall require prior approval of IDEM, Office of Air Quality before such change can occur.

This registration the first registration 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 Office of Air Quality 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
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. If you have any questions on this matter, please contact Nathan C. Bell, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 317-234-3350 or at 1-800-451-6027 (ext 43350).

Sincerely,

Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

NCB
cc: File - Clark County
Clark County Health Department
Air Compliance Section Inspector - Ray Schick
Permit Tracking
Compliance Data Section
Administrative and Development

Registration
Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

Company Name:	Roll Forming Corporation
Address:	1205 North Access Road, Jeffersonville, IN 47130
City:	Jeffersonville
Authorized individual:	Tim Teegarden
Phone #:	(812) 284-0650 (Extension 221)
Registration #:	019-20332-00114

I hereby certify that Roll Forming Corporation is still in operation and is in compliance with the requirements of Registration 019-20332-00114.

Name (typed):
Title:
Signature:
Date:

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Registration Revision

Source Background and Description

Source Name:	**Roll Forming Corporation**
Source Location:	**1205 North Access Road, Jeffersonville, IN 47130**
County:	**Clark**
SIC Code:	**3499 (Manufacturing of Fabricated Metal Products, Not Elsewhere Classified)**
Application No.:	**019-20332-00114**
Reviewer:	**Nathan C. Bell**

On November 3, 2004, the Office of Air Quality (OAQ) received an application from Roll Forming Corporation relating to the operation of a stationary metal parts manufacturing plant (for automobiles, furniture, store fixtures, aerospace industry, and other custom parts industries). The source requested that the permit be updated to correctly identify the sources and the associated control devices that now exist at the plant, as well as, to indicate a change in potential emissions.

Unpermitted Emission Units and Pollution Control Equipment

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

(a) One (1) metal inert gas (MIG) welding station on process line 5443, designated as Unit 1, constructed in the Spring of 2003, with a maximum capacity of 23,803 tons of rolled steel per year and a maximum annual wire usage rate of 392.8 pounds of wire per year (GMAW Wire Types E70S-3, ER70S-6, and ER80S-D2);

(b) One (1) Dritech mechanical cut-off saw on process line 5443, constructed in the Spring of 2003, where an cutting coolant continuously floods the machining interface, with a maximum capacity of 23,803 tons of rolled steel per year;

(c) One (1) Vac-U-Paint surface coating system on process line 5443, designated as Unit 3, constructed in the Spring of 2003, that applies paint to metal parts using an air atomizing spray coater, with a maximum capacity of 23,803 tons of rolled steel per year and 71 tons of paint per year, with a paint transfer efficiency of 95%, with overspray controlled by vacuum extraction though template openings, and with extracted air filtered then exhausted through Stack 1;

(d) One (1) natural gas-fired heater on process line 5443, designated as Unit 6, constructed in the Spring of 2003, rated at 0.22 MMBtu/hr, exhausting to Stack 3; and

(e) One (1) natural gas-fired paint dryer on process line 5443, designated as Unit 4, constructed in the Spring of 2003, rated at 1.5 MMBtu/hr, exhausting to Stack 2;

(f) One (1) tungsten inert gas (TIG) welding station (nonconsumable) on process line 5410, designated as Unit 2, constructed in the Spring of 2003, with a maximum capacity of 32,861 tons of rolled steel per year;

(g) One (1) natural gas-fired heater associated with the regalvanizing spray unit on process line 5410, designated as Unit 5, constructed in August 2004, rated at with 0.22 MMBtu/hr, exhausting to Stack 4;

(h) One (1) wire brush unit associated with the regalvanizing spray unit on process line 5410 for smoothing of metal part surfaces following regalvanization, designated as Unit 5, constructed in August 2004, with a maximum capacity of 32,861 tons of rolled steel per year;

(i) One (1) rust preventative spray unit on process line 5410, using 4.6 gallons of hydrocarbon solvent per day, constructed in 2003, with a maximum capacity of 32,861 tons of rolled steel per year;

(j) One (1) Dreistern hydraulic cut-off unit on process line 5410, constructed in 2003, with a maximum capacity of 32,861 tons of rolled steel per year, utilizing a cutting oil for lubrication;

(k) One (1) cold cleaning degreaser used to perform non-halogenated organic solvent degreasing (mineral spirits) of parts and/or tools in process line 5410, constructed in 2003, utilizing 23 gallons of solvent per year. The cold cleaner is an offline system, batch type, which uses immersion, and is equipped with drain and remote reservoir with insignificant exposure to outside air; and

(l) Insignificant activities associated with use of lubricating oils, hydraulic oils, machining oils, and/or machining fluids (including coolants) associated with process lines 5443 and 5410;

Permitted Emission Units and Pollution Control Equipment

The source also consists of the following permitted emission unit:

(m) One (1) rolled steel regalvanizing spray unit on process line 5410, constructed in August 2004, where zinc is applied to rolled steel by galvanization at a maximum throughput 32,861 tons of steel per year, using zinc wire at a maximum usage rate of 8,215 pounds of zinc wire per year, and with a conservative transfer efficiency of 35%. To galvanize the rolled steel product, zinc wire (99.9% elemental zinc) is run through an oxygen and acetylene torch, melted, and then blown onto the steel surface.

Existing Approvals

The source has been operating under the following previous approval:

(a) Exemption 019-19584-00114, issued on August 18, 2004

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and/or operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the heading Unpermitted Emission Units and Pollution Control Equipment.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the application be approved as a registration. 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 November 3, 2004. Additional information was provided by the source on December 28, 2004.

Emission Calculations

See Appendix A of this TSD for detailed emissions calculations (Appendix A, pages 1 through 4).

Based on information provided by the source, potential emissions of particulate matter (PM) are negligible from the one (1) Dritech mechanical cut-off saw on process line 5443 where an cutting coolant continuously floods the machining interface, the one (1) wire brush unit on process line 5410, and the one (1) Dreistern hydraulic cut-off unit on process line 5410. Based on information provided by the source, each of these units is exempt from the requirements of 326 IAC 6-3.

Using the Environmental Protection Agency's (EPA) TANKS Version 4.09b program, it was determined that storage of lubricating oils, hydraulic oils, machining oils, and/or machining fluids (including coolants) at this source would have negligible potential emissions of volatile organic compounds (VOCs).

The potential to emit of particulate matter from the regalvanizing spray unit was calculated to be 2.67 tons PM/PM10 per year as part of Exemption 019-19584-00114 based on a maximum annual zinc wire usage rate of 8, 215 lb/yr, a transfer efficiency of 35%, no controls, and 8760 hours of operation as follows.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit (PTE) 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."

The following table reflects the existing source potential to emit. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit:

Pollutant	Potential To Emit (tons/year)
PM	5.6
PM-10	5.6
SO_2	0.01
NO_x	0.85
VOC	24.6
CO	0.71

HAP's	Potential To Emit (tons/year)
Glycol Ethers	8.72
Benzene	negligible
Dichlorobenzene	negligible
Formaldehyde	negligible
n-Hexane	0.02
Toluene	0.29
Lead	negligible
Cadmium	negligible
Chromium	0.90
Manganese	negligible
Nickel	negligible
TOTAL HAPs	**9.92**

(a) The PTE (as defined in 326 IAC 2-1.1-1(16)) of regulated criteria pollutants are less than twenty-five (25) tons per year, but the PTE of particulate matter (PM or PM-10) is greater than five (5) tons per year and/or the PTE of all other regulated criteria pollutants are greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.5. A registration will be issued.

(b) The PTE (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE 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.

County Attainment Status

The source is located in Clark County.

Pollutant	Status
PM10	Attainment or Unclassifiable
SO_2	Attainment
NO_2	Attainment or Unclassifiable
1-Hour Ozone	Maintenance Attainment
8-Hour Ozone	Basic Nonattainment
CO	Attainment or Unclassifiable
Lead	Attainment or Unclassifiable

(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 and NOx emissions are considered when evaluating the rule applicability relating to the ozone standard. Clark 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) Clark County has been classified as attainment or unclassifiable for all the other regulated 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.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

New Source PSD and Emission Offset 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	5.6
PM-10	5.6
SO_2	0.01
NO_x	0.85
VOC	24.6
CO	0.71
Worst Single HAP	8.72
Combination HAPs	9.92

(a) This new source is not an Emission Offset major source because no regulated nonattainment pollutant is emitted at a rate of 100 tons/yr or greater.

(b) This existing source is not a major PSD 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. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the 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/year.

This status is based on the potential to emit calculations of the source (see Appendix A).

Federal Rule Applicability

(a) This source is not subject to the requirements of 40 CFR 60, Subpart E (60.50 through 60.54), Standards of Performance for Incinerators (326 IAC 12), because the natural gas-fired dryer and heaters have a charging rate less than fifty (50) tons per day and they do not burn refuse consisting of more than 50 percent municipal type waste (household, commercial/retail, and/or institutional waste).

(b) This source is not subject to the requirements of the following New Source Performance Standards (NSPS), because the natural gas-fired dryer and heaters are not considered municipal waste combustors or hospital/medical/infectious waste incinerators:

(1) 40 CFR 60 Subpart Ea (60.50a through 60.59a), Standards of Performance for Large Municipal Waste Combustors for Which Construction is Commenced after December 20, 1989 and on or before September 20, 1994 (326 IAC 12)

(2) 40 CFR 60 Subpart Eb (60.50b through 60.59b), Standards of Performance for Large Municipal Waste Combustors for Which Construction is Commenced after September 20, 1994, or for Which Modification or Reconstruction is commenced after June 19, 1996 (326 IAC 12)

(3) 40 CFR 60 Subpart Ec (60.50c through 60.58c), Standards of Performance for Hospital/Medical/Infectious Waste Incinerators for Which Construction is Commenced after January 20, 1996 (326 IAC 12)

(4) 40 CFR 60 Subpart AAAA (60.1000 through 60.1465), Standards of Performance for Small Municipal Waste Combustion Units for Which Construction is Commenced After

August 30, 1999 or for Which Modification or Reconstruction is Commenced After June 6, 2001 (326 IAC 12)

(c) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

(d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart MMMM (63.3880 through 63.3981), Miscellaneous Metal Parts and Products Surface Coating, because this source is not a major source of HAPs as defined in 40 CFR 63.2.

(e) This source is not subject to the requirements of 40 CFR 63, Subpart DDDDD, (63.7480 through 63.7575), NESHAPs for Industrial, Commercial, and Institutional Boilers and Process Heaters, because the source is not a major source of HAPs.

(f) This source is not subject to the requirements of 40 CFR Subpart EEE (63.1200 through 63.1214), NESHAPs from Hazardous Waste Combustors (326 IAC 20-28-1), because the natural gas-fired dryer and heaters are not considered hazardous waste incinerators and the source is not a major source of HAPs.

(g) This source is not subject to the requirements of the 40 CFR Subpart T (63.460 through 63.470), NESHAP for for Halogenated Solvent Cleaning, because this operation does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).

(h) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in the permit for this source.

State Rule Applicability - Entire Source

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

This source was initially constructed after the applicability date of August 7, 1977, however, it is not one of the 28 listed source categories defined in 326 IAC 2-2-1(y)(1), no major modifications are being done to this source, and the uncontrolled potential to emit of all attainment regulated pollutants is less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

326 IAC 2-3 (Emission Offset)

The requirements of 326 IAC 2-3 (Emission Offset) apply to major sources or major modifications constructed in an area designated as non-attainment. The uncontrolled potential to emit of VOC and NOx are each less than 100 tons per year. When this area is designated by the state rules, the requirements of 326 IAC 2-3 (Emission Offset) will not be applicable.

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

The requirements of 326 IAC 2-4.1 are not applicable to this source, since the potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it is located in Clark County, it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year.

326 IAC 5-1 (Opacity Limitations)

This source is located in Clark County, Jeffersonville Township as noted in 326 IAC 5-1-1(c)(1). Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

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

State Rule Applicability - Individual Facilities

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

The requirements of 326 IAC 6-1 are not applicable to this source and each of the emission units at this source, since this source, which is located in Clark County, is not specifically listed in the section pertaining to Clark County (326 IAC 6-1-17) and the potential particulate matter (PM) emissions for this source are less than the applicable potential and actual levels of 100 and 10 tons per year.

326 IAC 8-1-6 (VOC rules: General Reduction Requirements for New Facilities)

The requirements of 326 IAC 8-1-6 are not applicable, since each of the emission units at this source does not have the potential to emit greater than twenty-five (25) tons of VOCs per year.

State Rule Applicability - Surface Coating Operations

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The requirements of 326 IAC 6-3-2 are applicable to the Vac-U-Paint surface coating system on process line 5443, since the unit applies surface coatings using an air atomizing spray coater, has potential particulate emissions greater than five hundred fifty-one thousandths (0.551) pound per hour, and has the potential to use greater than five (5) gallons per day of surface coatings.

Pursuant to 326 IAC 6-3-2(d), particulate from the Vac-U-Paint surface coating system on process line 5443 shall be controlled by 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 an observation:

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

(2) Operate equipment so that no overspray is visible 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 (Volatile Organic Compounds; Surface Coating Emission Limitations)

Pursuant to 8-2-1(a)(4) and 8-2-9(a)(5), the requirements of 326 IAC 8-2-9 are applicable to the Vac-U-Paint surface coating system on process line 5443, since the unit was constructed after July 1, 1990 and has the potential to emit VOCs at a rate greater than fifteen (15) pounds per day before add-on controls, and since the source performs surface coating of metal parts and products under the Standard Industrial Classification Code of major group #34.

Pursuant to 326 IAC 8-2-9(d), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts and products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds per gallon of coating, excluding water, delivered to a coating applicator, in a coating application system that is air dried.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS for the Vac-U-Paint surface coating, the VOC content is 2.17 pounds per gallon, excluding water (see Page 2 of 4 TSD Appendix A for detailed calculations). Therefore, the source is in compliance with 326 IAC 8-2-9.

State Rule Applicability – Natural Gas Combustion Sources

326 IAC 4-2-2 (Incinerators)

The natural gas- dryer and heaters are not incinerators, as defined by 326 IAC 1-2-34, since they do not burn waste sustances. Therefore, these ovens are not subject to 326 IAC 4-2-2.

326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

The natural gas-fired dryer and heaters are not subject to 326 IAC 6-2 as they are not sources of indirect heating.

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

Pursuant to 326 IAC 6-3-1(b)(14), each of the natural gas-fired dryer and heaters are exempt from the requirements of 326 IAC 6-3, because they each have a potential particulate emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)

The natural gas-fired dryer and heaters are each not subject to the requirements of 326 IAC 7-1, because the potential and the actual emissions are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

State Rule Applicability - Welding Operations

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

Pursuant to 326 IAC 6-3-1(b)(9), the metal inert gas (MIG) welding station on process line 5443 is exempt from the requirements of 326 IAC 6-3, because the potential to consume welding wire is less than six hundred twenty-five (625) pounds per day.

State Rule Applicability - Cold Cleaner Degreasing Units

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-1 (Organic Solvent Degreasing Operations), the cold cleaning degreaser is

subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations), because it was constructed in 1998, after the applicability date of January 1, 1980. Pursuant to this rule, the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The cold cleaning degreaser is not subject to the requirements of 326 IAC 8-3-5 because the degreaser has a remote solvent reservoir.

326 IAC 20-6-1 (Halogenated Solvent Cleaning)

This source is not subject to the requirements of the 326 IAC 20-6-1, since the degreasing operations do not use a solvent that contains any of the halogenated compounds listed in 326 IAC 20-6-1(a).

State Rule Applicability - Regalvanization Spray Unit

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

The requirements of 326 IAC 6-3 are applicable to the regalvanization spray unit. Pursuant to 326 IAC 6-3-2, the allowable PM emission rate for a maximum process weight rate of 32,861 tons of steel per year (3.75 tons per hour) shall be 9.94 pounds per hour.

$E = 4.10\ P^{0.67} = 4.10 * [3.75]^{0.67} = 9.94$ lb/hr

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

The hourly potential PM emissions are estimated to be 0.61 lb/hr (2.67 tons per year), which is less than the 326 IAC 6-3-2 allowable hourly rate of 9.94 lb/hr. Therefore, compliance with 326 IAC 6-3 is expected.

Conclusion

The operation of these facilities shall be subject to the conditions of the attached registration, No 019-20332-00114.

Appendix A: Emissions Calculations
VOC, Particulate, HAPs
Emission Summary

Company Name: Roll Forming Corporation
Address City IN Zip: 1205 North Access Road, Jeffersonville, IN 47130
Permit Number: 019-20332
Plt ID: 019-00114
Reviewer: Nathan C. Bell
Date: December 30, 2004

		Uncontrolled Potential Emissions (tons/year)				
		Emissions Generating Activity				
Category	Pollutant	Paint Booth	Natural Gas Combustion	Welding	Regalvanizing Spray Unit*	**TOTAL**
Criteria Pollutants	PM	2.9	0.02	1.1E-03	2.67	5.6
	PM10	2.9	0.06	1.1E-03	2.67	5.6
	SO2		0.01			0.01
	NOx		0.85			0.85
	VOC	24.6	0.05			24.6
	CO		0.71			0.71
Hazardous Air Pollutants	Glycol Ethers	8.72				8.72
	Benzene		1.8E-05			1.8E-05
	Dichlorobenzene		1.0E-05			1.0E-05
	Formaldehyde		6.4E-04			6.4E-04
	n-Hexane		0.02			0.02
	Toluene	0.29	2.9E-05			0.29
	Lead		4.2E-06			4.2E-06
	Cadmium		9.3E-06			9.3E-06
	Chromium	0.90	1.2E-05	2.0E-07		0.90
	Cobalt			2.0E-07		2.0E-07
	Manganese		3.2E-06	6.2E-05		6.6E-05
	Nickel		1.8E-05	2.0E-07		1.8E-05
	Totals	**9.90**	**0.02**	**6.3E-05**	**0**	**9.92**
					Worse Case HAP	**8.72**

Total emissions based on rated capacity at 8,760 hours/year.
*Emissions from regalvanizing spray unit were performed as part of Exemption 019-19584-00114

Appendix A: Emissions Calculations
VOCs, Particulate, HAPs
Surface Coatings, Oils, Lubes, Solvents, and Other Fluids
Process Line 5443 and 5410

Company Name: Roll Forming Corporation
Address City IN Zip: 1205 North Access Road, Jeffersonville, IN 47130
Permit Number: 019-20332
Plt ID: 019-00114
Reviewer: Nathan C. Bell
Date: December 30, 2004

Volatile Organic Comounds (VOC) and Particulate Matter (PM)

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water + Non-VOCs	Weight % Solids	Weight % VOCs	Volume % Water + Non-VOCs	Volume % Solids	Maximum Usage (gal/day)*	Maximum Usage (lbs/hour)	Pounds VOC per gallon of coating less water and non-VOCs	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/year)	Particulate Matter Potential (lb/hr)	Particulate Matter Potential (tons/yr)	lb VOC per gal solids	Transfer Efficiency
Elpaco Black W/B Vac-U-Paint (line 5443)	9.01	24.1%	0.0%	75.9%	24.1%	0.0%	70.0%	43.4	16.3	2.17	2.17	3.92	94.12	17.18	0.618	2.71	3.10	95%
Butyl Cellosolve Paint Diluent (line 5443)	7.51	100.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.6	0.2	7.51	7.51	0.20	4.78	0.87	0	0	-	100%
Krylon Ultra Flat Black Paint (line 5443)	6.51	85.05%	32.0%	14.95%	53.05%	50.0%	10.0%	2.7	0.7	6.91	3.45	0.39	9.28	1.69	0.04	0.17	34.54	65%
Mobilment S 122 Cutting Oil (line 5410)**	6.94	100.00%	80.0%	0.00%	20.00%	80.0%	0.0%	0.4	0.1	6.94	1.39	0.02	0.51	0.09	0	0	-	100%
Cimguard 22 Corrosion/Rust Prevention Oil (line 5410)	6.94	100.00%	41.6%	0.00%	58.40%	41.6%	0.0%	4.6	1.3	6.94	4.05	0.77	18.56	3.39	0	0	-	100%
Valcool VNT 700 Miter Saw Coolant (line 5410)**	8.67	100.00%	87.2%	0.00%	12.84%	87.2%	0.0%	0.7	0.3	8.70	1.11	0.03	0.81	0.15	0	0	-	100%
Castrol WY3-088C forming Coolant (line 5410)**	9.19	100.00%	40.0%	0.00%	60.00%	40.0%	0.0%	1.1	0.4	9.19	5.51	0.25	5.95	1.09	0	0	-	100%
Imco Gel 980-000 Mandrn bender w/b grease (line 5410)**	8.00	100.00%	96.0%	0.00%	4.00%	96.0%	0.0%	0.9	0.3	8.00	0.32	0.01	0.27	0.05	0	0	-	100%
SK Premium Gold Solv Parts Washer (line 5410)**	5.84	100.0%	0.0%	0.0%	100.0%	0.0%	0.0%	0.06	0.02	5.84	5.84	0.02	0.37	0.07	0	0	-	100%
											Totals	**5.61**	**134.65**	**24.57**	**0.66**	**2.87**		

*Maximum Usage provided by source = Potential Paint Usage (lbs/year) / (Denisty (lbs/gal) * 365 days/year)

**VOC Content provided by source

METHODOLOGY

Maximum Usage (lbs/hr) = Maximum Usage (gal/day) * Density (lb/gal) / (24 hour/day)
Pounds of VOC per Gallon Coating less Water and non-VOCs = (Density (lb/gal) * Weight % VOCs) / (1-Volume % water and non-VOCs)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % VOCs)
Potential VOC Pounds per Hour = Maximum Usage (lbs/hr) * Weight % VOCs
Potential VOC Pounds per Day = Potential VOC (lbs/hr) * (24 hours/day)
Potential VOC Tons per Year = Potential VOC (lbs/day) * (365 days/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = Density (lbs/gal) * Maximum Usage (gal/day) * (Weight % Solids) * (1-Transfer efficiency) *(365 days/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % VOCs) / (Volume % solids)

Hazardous Air Pollutants (HAPs)

Material	Density (Lb/Gal)	Maximum Usage (gal/day)	Weight % Glycol Ethers	Glycol Ether Emissions (ton/yr)	Weight % Chromium	Chromium Emissions (ton/yr)	Weight % Toluene	Toluene Emissions (ton/yr)	Total HAPs (tons/yr)
Elpaco Black W/B Vac-U-Paint (line 5443)	9.01	43.4	11.0%	7.85	1.3%	0.90			8.74
Butyl Cellosolve Paint Diluent (line 5443)	7.51	0.6	100.0%	0.87					0.87
Krylon Ultra Flat Black Paint (line 5443)	6.51	2.7					9.0%	0.29	0.29
		Totals		**8.72**		**0.90**		**0.29**	

TOTAL HAPs 9.90 ton/yr

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Maximum Usage (gal/day) * Weight % HAP * 365 days/yr * 1 ton/2000 lbs
Note: Glycol Ethers include 2-Butyoxyethanol (Ethylene Glycol Monobutyl Ether)

Appendix A: Emissions Calculations
VOCs, Particulate, HAPs
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: **Roll Forming Corporation**
Address City IN Zip: **1205 North Access Road, Jeffersonville, IN 47130**
Permit Number: **019-20332**
Plt ID: **019-00114**
Reviewer: **Nathan C. Bell**
Date: **December 30, 2004**

				Pollutant	PM*	PM10*	SO2	NOx**	VOC	CO
				Emission Factor (lb/MMCF)	1.9	7.6	0.6	100	5.5	84.0
Emission Unit	Number of Units	Unit Heat Input Capacity MMBtu/hr	Combined Total Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission tons/yr					
					PM*	PM10*	SO2	NOx**	VOC	CO
Paint Dryer on process line 5443	1	1.5	1.5	13.14	0.012	0.050	0.004	0.657	0.036	0.552
Vac-U-Paint heater on process line 5443	1	0.22	0.22	1.93	0.002	0.007	0.001	0.096	0.005	0.081
Galvinizing Spray heater on process line 5410	1	0.22	0.22	1.93	1.8E-03	0.007	0.001	0.096	0.005	0.081
Totals	**3**		**1.9**		**0.016**	**0.065**	**0.005**	**0.850**	**0.047**	**0.714**

Pollutant	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
	Potential Emission tons/yr									
Emission Unit	Benzene	DCB	Formaldehyde	Hexane	Toluene	Pb	Cd	Cr	Mn	Ni
Paint Dryer on process line 5443	1.4E-05	7.9E-06	4.9E-04	0.012	2.2E-05	3.3E-06	7.2E-06	9.2E-06	2.5E-06	1.4E-05
Vac-U-Paint heater on process line 5443	2.0E-06	1.2E-06	7.2E-05	0.002	3.3E-06	4.8E-07	1.1E-06	1.3E-06	3.7E-07	2.0E-06
Galvinizing Spray heater on process line 5410	2.0E-06	1.2E-06	7.2E-05	0.002	3.3E-06	4.8E-07	1.1E-06	1.3E-06	3.7E-07	2.0E-06
Totals	**1.8E-05**	**1.0E-05**	**6.4E-04**	**0.015**	**2.9E-05**	**4.2E-06**	**9.3E-06**	**1.2E-05**	**3.2E-06**	**1.8E-05**

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Methodology
Potential Throughput (MMCF) = Combined Total Heat Input Capacity (MMBtu/hr) * 8,760 hrs/yr * 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) * Emission Factor (lb/MMCF) / 2,000 lb/ton
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu, MMCF = 1,000,000 Cubic Feet of Gas

Abbreviations

PM = Particulate Matter	NOx = Nitrous Oxides	DCB = Dichlorobenzene	Cr = Chromium
PM10 = Particulate Matter (<10 um)	VOC - Volatile Organic Compounds	Pb = Lead	Mn = Manganese
SO2 = Sulfur Dioxide	CO = Carbon Monoxide	Cd = Cadmium	Ni = Nickel

Appendix A: Emissions Calculations
VOCs, Particulate, HAPs
Welding Operations

Company Name: Roll Forming Corporation
Address City IN Zip: 1205 North Access Road, Jeffersonville, IN 47130
Permit Number: 019-20332
Plt ID: 019-00114
Reviewer: Nathan C. Bell
Date: December 30, 2004

Particulate Matter (PM) and Hazardous Air Pollutants (HAPs)

PROCESS	Max. electrode consumption per station (lbs/hr)	Max. electrode consumption per station (lbs/day)	Number of Stations	Max. electrode consumption (lbs/year)	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)
WELDING					PM = PM10	Cr	Co	Mn	Ni	PM = PM10	Cr	Co	Mn	Ni	
Gas Metal Arc Welding (ER70S)	0.045	1.08	1	393	5.4E-03	1.0E-06	1.0E-06	3.2E-04	1.0E-06	2.4E-04	4.5E-08	4.5E-08	1.4E-05	4.5E-08	1.4E-05

Abbreviations
Cr = Chromium
Co = Cobalt
Mn = Manganese
Ni = Nickel

Total Potential Emissions lbs/hr	2.4E-04	4.5E-08	4.5E-08	1.4E-05	4.5E-08	1.4E-05
Total Potential Emissions lbs/day	5.8E-03	1.1E-06	1.1E-06	3.4E-04	1.1E-06	3.5E-04
Total Potential Emissions tons/year	1.1E-03	2.0E-07	2.0E-07	6.2E-05	2.0E-07	6.3E-05

METHODOLOGY
Maximum electrode consuption rate = 60 lbs/year (maximum) * 6.54654 (potential factor) / 8,760 hrs/year
Emission Factors are default values for Gas Metal Arc Welding (GMAW) (SCC 3-09-052) Electrode Type ER70S, AP-42
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.