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: July 13, 2005

RE: Kitchen Quip, Inc. / 033-20384-00045

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

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

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 from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot 1/10/05

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July 13, 2005

Mr. Steve Sparling
Kitchen Quip, Inc.
P.O. Box 548
Waterloo, IN 46793

Re: Exempt Construction and Operation Status,
033-20384-00045

Dear Mr. Sparling:

The application from Kitchen Quip, Inc. - Building 1, received on November 17, 2004, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following food products machinery manufacturing source, located at 405 East Marion St., Waterloo, Indiana, is classified as exempt from air pollution permit requirements:

(a) One (1) natural gas-fired space heater, identified as Space Heater 1, constructed in 1993, heat input capacity: 0.08 million British thermal units per hour.

(b) Three (3) natural gas-fired space heaters, identified as Space Heaters 2 through 4, constructed in 1993, heat input capacity: 0.05 million British thermal units per hour, each.

(c) Four (4) natural gas-fired space heaters, identified as Space Heaters 5, 6, 10 and 11, constructed in 1968, heat input capacity: 0.03 million British thermal units per hour, each.

(d) One (1) natural gas-fired space heater, identified as Space Heater 7, constructed in 1994, heat input capacity: 0.20 million British thermal units per hour.

(e) Two (2) natural gas-fired space heaters, identified as Space Heaters 9 and 12, constructed in 1992, heat input capacity: 0.15 million British thermal units per hour, each.

(f) One (1) natural gas-fired space heater, identified as Space Heater 13, constructed in 1993, heat input capacity: 0.25 million British thermal units per hour.

(g) One (1) natural gas-fired evaporator, constructed in 1992, heat input capacity: 0.35 million British thermal units per hour.

The following condition shall be applicable:

(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:

(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 15 minutes (60 readings in a 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.

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
Kathy Moore, Section Chief
Permits Branch
Office of Air Quality

CAP/MES

cc: File - DeKalb County
DeKalb County Health Department
Air Compliance - Doyle Houser
Northern Regional Office
Permit Tracking
Compliance Data Section

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	**Kitchen Quip, Inc. – Building 1**
Source Location:	**405 East Marion St., Waterloo, IN 46793**
County:	**DeKalb**
SIC Code:	**3312**
Exemption No.:	**033-20384-00045**
Permit Reviewer:	**CarrieAnn Paukowits/MES**

The Office of Air Quality (OAQ) has reviewed an application from Kitchen Quip, Inc. for a transition from a Registration for the operation of a food products machinery manufacturing source to an Exemption. This building is an assembly source. The only emissions are from combustion.

Source Definition

Kitchen Quip, Inc. operates two (2) sources in Waterloo, Indiana.

(a) Building 1 is located at 405 East Marion Street, Waterloo; and

(b) Building 2 is located at 675 East US 6, Waterloo.

The two (2) sources have the same SIC codes and are owned by one (1) company. However, they are not on contiguous or adjacent properties, do not have a physical connection between the two (2) buildings other than public roads, none of the output from either plant is sent to the other plant for further processing, and the buildings have different plant managers responsible for day to day operations. Therefore, they are not considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) natural gas-fired space heater, identified as Space Heater 1, constructed in 1993, heat input capacity: 0.08 million British thermal units per hour.

(b) Three (3) natural gas-fired space heaters, identified as Space Heaters 2 through 4, constructed in 1993, heat input capacity: 0.05 million British thermal units per hour, each.

(c) Four (4) natural gas-fired space heaters, identified as Space Heaters 5, 6, 10 and 11, constructed in 1968, heat input capacity: 0.03 million British thermal units per hour, each.

(d) One (1) natural gas-fired space heater, identified as Space Heater 7, constructed in 1994, heat input capacity: 0.20 million British thermal units per hour.

(e) Two (2) natural gas-fired space heaters, identified as Space Heaters 9 and 12, constructed in 1992, heat input capacity: 0.15 million British thermal units per hour, each.

(f) One (1) natural gas-fired space heater, identified as Space Heater 13, constructed in 1993, heat input capacity: 0.25 million British thermal units per hour.

(g) One (1) natural gas-fired evaporator, constructed in 1992, heat input capacity: 0.35 million British thermal units per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment

There are no new emission units proposed at this time.

Emission Units and Pollution Control Equipment Removed

The following facilities have been removed from the source and are not included in the proposed permit:

The zinc melt pot furnace, identified as P-1, zinc die cast machines, identified as P-2, P-3, P-4 and P-5, aluminum melt pots, identified as P-7, P-9, P-11, and P-13, aluminum electric melt pot, identified as P-14, grinding station, identified as P-17, buffing station, identified as P-16, and buffing/polishing stations, identified as P-19 and P-20, have been removed from the source since the initial Registration, 033-4158-00045, was issued on March 30, 1995.

Existing Approvals

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

Registered Construction and Operation Status permit no. 033-4158-00045 issued on March 30, 1995

All conditions from previous approvals were incorporated into this permit except the following:

Pursuant to 326 IAC 6-3, the grinding station particulate emissions is limited to 7.2 lb/day, buffing station, P-16, is limited to 1.83 lb/day, and buffing/polishing stations, P-19 and P-20, are limited to 2.42 lb/day.

Reason not incorporated: The grinding, buffing and polishing operations have been removed from the source.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 17, 2004, with additional information received on May 6 and June 7, 2005.

Emission Calculations

See Appendix A (2 pages) of this document for detailed emission calculations.

Potential to Emit (of the Source or Revision) 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, inclulding 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	0.012
PM_{10}	0.048
SO_2	0.004
VOC	0.035
CO	0.533
NO_x	0.635

HAPs*	Potential to Emit (tons/yr)
Hexane	0.011
Total	0.012

* Negligible amounts of other individual HAPs are emitted from this source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption 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 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 subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

(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 DeKalb County.

Pollutant	Status
$PM_{2.5}$	attainment
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
1-Hour Ozone	attainment
8-Hour Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and nitrogen oxides (NO_X) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to ozone. DeKalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) DeKalb County has been classified as unclassifiable or attainment for $PM_{2.5}$. U.S. EPA has not yet establised the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for $PM_{2.5}$ emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for $PM_{2.5}$ emissions, it has directed states to regulate PM_{10} emissions as surrogate for $PM_{2.5}$ emissions.

(c) DeKalb County has been classified as attainment or unclassifiable in Indiana 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 Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	0.012
PM_{10}	0.048
SO_2	0.004
VOC	0.035
CO	0.533
NO_x	0.635

Pollutant	Emissions (tons/yr)
Single HAP	0.011
Combination HAPs	0.012

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of two-hundred fifty (250) tons per year or greater and it is not in one of the twenty-eight (28) listed source categories.

(b) The emissions in this table are the unrestricted potential emissions from the source.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

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

(a) each criteria pollutant is less than one-hundred (100) tons per year,

(b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and

(c) the combination of HAPs is less than twenty-five (25) tons per year.

This status is based on all the air approvals issued to the source.

Federal Rule Applicability

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

(b) 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 2-6 (Emission Reporting)

This source is not located in Lake or Porter County with the potential to emit greater than twenty-five (25) tons per year of NO_X, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

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 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.

State Rule Applicability – Individual Facilities

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

The unrestricted potential emissions of each attainment criteria pollutant are less than two-hundred fifty (250) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is a minor source pursuant to 326 IAC 2-2, PSD.

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

The operation of this food products machinery manufacturing source will emit less than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of a combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

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

There are no boilers at this source. Therefore, the requirements of 326 IAC 6-2 are not applicable.

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

The unrestricted potential particulate emissions from each facility at this source are less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 are not applicable.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The potential SO_2 emissions from this source are less than ten (10) pounds per hour and twenty-five (25) tons per year. Therefore, this source is not subject to the requirements of 326 IAC 7-1.1.

Conclusion

The operation of this food products machinery manufacturing source shall be subject to the conditions of the **Exemption 033-20384-00045.**

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Kitchen Quip, Inc. - Building 1
Address City IN Zip: 405 East Marion St., Waterloo, IN 46793
Exemption: 033-20384
Plt ID: 033-00045
Reviewer: CarrieAnn Paukowits
Application Date: November 17, 2004

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100	5.50	84.0
				**see below		

*PM emission factor is filterable PM only. PM-10 emission factor is filterable and condensable PM-10 combined.

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

Equipment	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emissions in tons/yr					
			PM*	PM10*	SO2	NOx	VOC	CO
Space Heater 1	0.08	0.7008	0.001	0.003	0.000	0.035	0.002	0.029
Space Heaters 2-4	0.15	1.314	0.001	0.005	0.000	0.066	0.004	0.055
Space Heaters 5, 6, 10 & 11	0.12	1.0512	0.001	0.004	0.000	0.053	0.003	0.044
Space Heater 7	0.20	1.752	0.002	0.007	0.001	0.088	0.005	0.074
Space Heaters 9 & 12	0.30	2.628	0.002	0.010	0.001	0.131	0.007	0.110
Space Heater 13	0.25	2.19	0.002	0.008	0.001	0.110	0.006	0.092
Evaporator	0.35	3.066	0.003	0.012	0.001	0.153	0.008	0.129
Total	**1.45**	**12.7**	**0.012**	**0.048**	**0.004**	**0.635**	**0.035**	**0.533**

Methodology

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

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

Company Name: **Kitchen Quip, Inc. - Building 1**
Address City IN Zip: **405 East Marion St., Waterloo, IN 46793**
Exemption: **033-20384**
Plt ID: **033-00045**
Reviewer: **CarrieAnn Paukowits**
Application Date: **November 17, 2004**

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.0021	0.0012	0.0750	1.8000	0.0034
Potential Emission in tons/yr	0.00001	0.000008	0.0005	0.011	0.00002

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	0.0005	0.0011	0.0014	0.0004	0.0021	HAPs
Potential Emission in tons/yr	0.000003	0.000007	0.000009	0.000002	0.00001	**0.012**

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.