

July 29, 2005



Mr. Jack Duffin
Indianapolis RV Tech
5701 Elmwood Ave Suite C
Indianapolis, IN 46203

Dear Mr. Duffin

Re: Exempt Operation Status,
097-20473 -00558

The application from Indianapolis RV Tech, received on December 8, 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 Recreational Vehicle Body Repair Operation, located at 5701 Elmwood Ave Suite C, Indianapolis, Indiana, is classified as exempt from air pollution permit requirements:

Painting operation with a maximum capacity of 0.003 units per hour using 3 gallons of coatings per unit.

The following conditions 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 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 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.

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

An application or notification shall be submitted in accordance with 326 IAC 2 to the Indianapolis Office of Environmental Services (OES) and Indiana Department of Environmental Management (IDEM), 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, please contact Warner Myron Waters at (317)327-2182 or wwaters@indygov.org.

Sincerely,

ORIGINAL SIGNED BY

Felicia A. Robinson,
Manager of Environmental Planning

FAR/wmw

cc: Files 2 copies
Marion County Health Department
Air Compliance, Matt Mosier
IDEM, Mindy Hahn

Department of Public Works
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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

Technical Support Document (TSD) for a Exemption

Source Background and Description

Source Name:	Indianapolis R.V. Tech
Source Location:	5701 C. Elmwood Avenue
County:	Marion
SIC Code:	7532
Operation Permit No.:	097-20473-00558
Permit Reviewer:	Warner Waters

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed an application from Indianapolis R.V. Tech relating to the operation of a recreational vehicle repair facility. The source consists of the following operation:

Painting operation with a maximum capacity of 0.003 units per hour using 3 gallons of coatings per unit.

Unpermitted Emission Units and Pollution Control Equipment

There are unpermitted emission units operating at this source during this review process. The facility was constructed in January 2001 and was constructed prior to receiving approval, however, the source is considered exempt, therefore, no enforcement action was taken.

Existing Approvals

There are no existing approvals.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the construction and 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 submitted by the applicant.

A complete application for the purposes of this review was received on December 8, 2004.

Emission Calculations

See Appendix A, page 1 and 2 of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source 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/year)
PM	0.2
PM10	0.2
SO ₂	-
VOC	0.63
CO	-
NO _x	-
Single HAP	.1012
Combination HAP	.1110

- (a) The potential to emit 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 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 Marion County.

Pollutant	Status
PM-10	Attainment
PM 2.5	Nonattainment
SO ₂	Maintenance Attainment
NO ₂	Attainment
1-hour Ozone	Maintenance Attainment
8-hour Ozone	Basic Nonattainment
CO	Maintenance Attainment
Lead	Maintenance Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx 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 NOx 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.

Source Status

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

Pollutant	Emissions (ton/yr)
PM	0.2
PM10	0.2
SO ₂	-
VOC	0.63
CO	-
NO _x	-
Single HAP	.1012
Combination HAP	.1110

This source is not a major stationary source because no attainment 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. This source is not a major stationary source because no nonattainment pollutant is emitted at a rate of 100 tons per year or greater. Therefore, the PSD and Emission Offset requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This source 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/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR 61, 40 CFR 63, 326 IAC 14 and 326 IAC 20) included in this approval.
- (b) There are no New Source Performance Standard (NSPS) 326 IAC 12, (40 CFR 60.40), included in this approval.

State Rule Applicability - Entire Source

326 IAC 1-6 (Preventive Maintenance Plan)

The source is not subject to 326 IAC 1-6, because the source is not required to obtain a permit under 326 IAC 2.

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

This source is not one (1) of the twenty-eight (28) listed source categories and has potential emissions less than 250 tons per year (tpy) of PSD regulated pollutants. Therefore, this source is not subject to the requirements of 326 IAC 2-2 (PSD).

326 IAC 2-3 (Emission Offset)

The source is not subject to the requirements of 326 IAC 2-3 (Emission Offset), since the source does not have the potential to emit 100 or more tons per year of volatile organic compounds (VOC), nitrogen oxides (NOx), or PM 2.5.

326 IAC 2-4.1 (Hazardous Air Pollutants)

The source is not subject to 326 IAC 2-4.1, because the source is not a major source of hazardous air pollutants, as defined in 40 CFR 63. The source will emit less than 10 tons per year of a single HAP and 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1(a), this source is not subject to 326 IAC 2-6 (Emission Reporting) because, as an Exempt source, it is not required to have an operating permit under 326 IAC 2-7, and 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 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.

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the surface coating process, not otherwise exempt in subdivisions (5) through (8) of this rule uses less than 5 gallons of coatings per day, therefore, 326 IAC 6-3-2 does not apply.

326 IAC 8-2 (Surface Coatings Emissions Limitations)

Pursuant to 326 IAC 8-2-1 (a)(4) , The source is not subject to 326 IAC 8-2. The source commenced construction after July 1, 1990, and has actual emissions of less than fifteen (15) pounds of VOC per day before add-on controls. No other Article 8 rules are applicable to this source.

Conclusion

The operation of this Recreational Vehicle Body Repair Operation shall be subject to the conditions of the Exemption E 097-20473-00558.

HAP Emission Calculations

Company Name: Indianapolis R.V. Tech
Address City IN Zip: 5701 C. Elmwood Ave. Indianapolis IN 46203
Permit Number: 097-20473-00558
Permit Reviewer: Warner Myron Waters
Date: 5-25-05

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethyl Benzene	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)
rs4202	10.5	3.00000	0.003	0.00%	24.00%	0.00%	0.00	0.10	0.00
dupont tint	10.0	3.00000	0.003	1.50%	1.50%	1.00%	0.01	0.01	0.0039

Total State Potential Emissions 0.0059 0.1012 0.0039

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (uni