



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 24, 2006
RE: Manchester Tank & Equipment Company / 093-20665-00010
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



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PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Manchester Tank and Equipment Company
905 "X" Street
Bedford, Indiana 47421**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17

Operation Permit No.: T093-20665-00010	
Original signed by: Nisha Sizemore, Chief Permit Branch Office of Air Quality	Issuance Date: July 24, 2006 Expiration Date: July 24, 2011

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates stationary metal pressure vessels manufacturing plant.

Responsible Official:	Ken McGaha
Source Address:	905 "X" Street, Bedford, Indiana 47421
Mailing Address:	905 "X" Street, Bedford, Indiana 47421
General Source Phone Number:	(812) 275-5931
SIC Code:	3443
County Location:	Lawrence
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

- (a) One (1) paint spray booth, identified as #7, constructed in 1987, utilizing an air atomization system, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C4.
- (b) One (1) paint spray booth, identified as PP1, constructed in July, 2001, utilizing an airless and air-assisted airless system, coating, using dry filters for particulate matter overspray control, and exhausting to two (2) stacks, identified as PP-01 and PP-02.
- (c) One (1) natural gas fired bake oven, identified as BkO1, constructed in July, 2001, with a maximum heat input capacity of 1.65 million British thermal units per hour (MMBtu/hr), equipped with a low NOx burner, for drying the coated tanks from spray booth PP1, with emissions exhausting to stacks BkO-01 and BkO-02.
- (d) One (1) pneumatic blasting operation, identified as SB1, constructed in July, 2001, utilizing dry filters for particulate matter control, exhausting to one (1) stack, identified as SB-01; and
- (e) One (1) metal oxyfuel/plasma cutting machine, identified as PC-1, constructed in 2005, used for cutting mild steel, aluminum and stainless steel, controlled by six (6) cartridge filters.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any specifically regulated insignificant activities, as defined in 326 IAC 2-7-1(21).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T093-20665-00010, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "Responsible Official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ and may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

Office of Environmental Services phone: (317) 327-2234; fax: (317) 327-2274

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ and may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T093-20665-00010 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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 6-4-2(4) is not federally enforceable.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3) (C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(b) (3), starting in 2006 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) paint spray booth, identified as #7, constructed in 1987, utilizing an air atomization system, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C4.
- (b) One (1) paint spray booth, identified as PP1, constructed in July, 2001, utilizing an airless and air-assisted airless system, using dry filters for particulate matter overspray control, and exhausting to two (2) stacks, identified as PP-01 and PP-02.
- (c) One (1) natural gas fired bake oven, identified as BkO1, constructed in July, 2001, with a maximum heat input capacity of 1.65 million British thermal units per hour (MMBtu/hr), equipped with a low NOx burner, for drying the coated tanks from spray booth PP1, with emissions exhausting to stacks BkO-01 and BkO-02.
- (d) One (1) pneumatic blasting operation, identified as SB1, constructed in July, 2001, utilizing dry filters for particulate matter control, exhausting to one (1) stack, identified as SB-01; and
- (e) One (1) metal oxyfuel/plasma cutting machine, identified as PC-1, constructed in 2005, used for cutting mild steel, aluminum and stainless steel, controlled by six (6) cartridge filters.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator of paint spray booths #7 and PP1.

D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of Lines 7 and PP1 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating 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.

D.1.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the pneumatic blasting operation (SB1) facilities shall not exceed 8.78 pounds per hour when operating at a process weight rate of 6,233 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 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

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the paint spray booths and any control devices.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Particulate Matter (PM) [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

In order to comply with conditions D.1.3 and D.1.4, the dry filters for PM controls shall be in operation at all times when the two (2) paint booths (#7 and PP1) and the one (1) pneumatic blasting operation (SB1) are in operation.

D.1.8 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (PP-01, PP-02 and C4) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The VOC content of each coating material and solvent used.
 - (2) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Manchester Tank and Equipment Company
Source Address: 905 "X" Street, Bedford, IN 47421
Mailing Address: 905 "X" Street, Bedford, IN 47421
Part 70 Permit No.: T093-20665-00010

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Manchester Tank and Equipment Company
Source Address: 905 "X" Street, Bedford, IN 47421
Mailing Address: 905 "X" Street, Bedford, IN 47421
Part 70 Permit No.: T093-20665-00010

This form consists of 2 pages

Page 1 of 2

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)
X The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
X The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Manchester Tank and Equipment Company
 Source Address: 905 "X" Street, Bedford, IN 47421
 Mailing Address: 905 "X" Street, Bedford, IN 47421
 Part 70 Permit No.: T093-20665-00010

Months: _____ **to** _____ **Year:** _____

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

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

**Addendum to the
Technical Support Document (TSD) for a Part 70 Permit Renewal**

Source Background and Description

Source Name:	Manchester Tank and Equipment Company
Source Location:	905 "X" Street, Bedford, Indiana 47421
County:	Lawrence
SIC Code:	3443
Operation Permit No.:	T093-20665-00010
Permit Reviewer:	Surya Ramaswamy / EVP

On February 22, 2006, the Office of Air Quality (OAQ) had a notice published in the Times Mail in Lawrence, Indiana, stating that Manchester Tank and Equipment Company had applied for a Part 70 permit renewal for the operation of a metal pressure vessels manufacturing plant. The notice also stated that OAQ proposed to issue a Part 70 Permit for this operation and provided information on how the public could review the proposed Part 70 Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Permit should be issued as proposed.

On March 16, 2006, Terri Evans, Human Resources Manager at Manchester Tank and Equipment Company submitted comments on the proposed Title V permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

A.3 Specifically Regulated Insignificant Activities

Section A of the permit states: "This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21)." However, source does have several insignificant activities on-site. Please change the permit to state:

This stationary source does not currently have any **specifically regulated** significant activities, as defined in 326 IAC 2-7-1(21).

Response 1

The following change has been made to Section A.3 as requested.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source does not currently have any **specifically regulated** insignificant activities, as defined in 326 IAC 2-7-1(21).

Comment 2

D.1.7 Particulate Matter (PM)

This condition incorrectly references Volatile Organic Compound (VOC) limitations. Please make the following change to correctly reference the Particulate Matter (PM) limitations:

In order to comply with conditions ~~D.1.4~~ **D.1.3** and ~~D.1.2~~ **D.1.4**, the dry filters for PM control...

Response 2

The following change has been made to Condition D.1.7 as requested.

D.1.7 Particulate Matter (PM) [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

In order to comply with conditions ~~D.1.4~~ **D.1.3** and ~~D.1.2~~ **D.1.4**, the dry filters for PM controls shall be in operation at all times when the two (2) paint booths (#7 and PP1) and the one (1) pneumatic blasting operation (SB1) are in operation.

Comment 3

D.1.8 Monitoring

The frequency of monitoring has changed since we reviewed the pre-public notice draft permit. We do not believe that twice-daily and weekly inspections are warranted for such small emissions units. IDEM has established guidance for Compliance Monitoring requirements since the start of issuing the 1990 CAA permits in Indiana. The guidance does not consider compliance monitoring requirements necessary if the allowable emissions of PM/PM10 are less than 10 lbs/hour when using a control device. The controlled PTE, using dust collectors for control, is considerably less than 10 lbs/hr. Therefore, compliance monitoring is not warranted. However, if IDEM issues the Title V permit with compliance monitoring, we believe that the frequency listed in the pre-public notice draft permit is a more acceptable frequency. We would request that it be changed to weekly pressure drop readings and monthly stack inspections; although again, we do not believe that any of this monitoring is warranted.

Response 3

Compliance monitoring conditions such as these requirements to perform daily and weekly inspections of dry filters are required in order to demonstrate continuous compliance with 326 IAC 6-3 and 326 IAC 5-1. The OAQ believes that checking the placement and integrity of the filters once a day is a very effective means of ensuring proper operation and ongoing compliance. Without periodic inspections, the improper placement or particle loading of the dry filters could lead to decreased control efficiency. Periodic inspections would help assure that these types of problems would be identified and fixed prior to the control device suffering a loss of control efficiency.

Similarly, observations of presence of overspray are necessary to demonstrate continuous compliance with 326 IAC 6-1 and 5-1. Monitoring for the presence of overspray ensures that the facility and the control device are operating properly, and OAQ believes that a monthly frequency is reasonable for this purpose. IDEM recognizes that in extreme circumstances accumulated ice and snow may prohibit safe rooftop access for a full month during the winter. To assure safety of the employees during such months when viewing of the rooftop is not practical, the records of monthly overspray observations should include a statement that overspray emissions were observed at the nearby ground only, and that the rooftop was inaccessible and include a description of the type of month-long inclement weather which prevented viewing the rooftop.

The monitoring requirements in the pre-public notice draft permit were incorrect. This error has been corrected by inserting the correct monitoring requirements. The following changes have been incorporated into the permit as a result:

D.1.8 Monitoring

~~The compliance monitoring requirements applicable to paint spray booths (PP1 and #7) are as follows:~~

- ~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, the Permittee shall monitor the pressure drop across the dry filters twice per day when one or more of the paint booths are in operation. The pressure drop shall remain within the range established by the manufacturer's specifications.~~
- ~~(b) The Permittee shall, on a weekly basis, monitor surface coating booth stacks PP-01, PP-02 and C4 for evidence of visible emissions while one or more of the booths are in operation. During this inspection, the Permittee shall also inspect the nearby ground for the presence of overspray.~~
- ~~(c) The Permittee, shall, on a semiannual basis, monitor for the presence of overspray on the rooftops.~~
- ~~(d) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.~~

~~These monitoring conditions are necessary because the dry filters for the paint booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).~~

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (PP-01, PP-02 and C4) while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.**
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.**

To be consistent with the changes in Condition D.1.8, the Condition D.1.9 (b) has been revised as follow:

D.1.9 Record Keeping Requirements

- ~~(b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of daily, weekly, and semiannual inspections. The Permittee shall maintain a log of pressure drop readings, and record the dates that dry filters are replaced. The pressure drop log shall indicate the base measurement for establishing the pressure drop range.~~

To document compliance with Condition D.1.7 and D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections.

Upon further review IDEM, OAQ has made the following changes to the Part 70 permit (additions in bold, deletions in strikeout):

1. In our Nonrule Policy Document, a table is given as an example for how sources can submit annual compliance certifications. B.9 Annual Compliance Certification is being revised to remove "in letter form" so that it does not contradict the guidance.

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted ~~in letter form~~ no later than July 1 of each year to:
2. Upon further review, IDEM has decided to remove (d) concerning nonroad engines from B.18 Permit Amendment or Modification. 40 CFR 89, Appendix A specifically indicates that states are not precluded from regulating the use and operation of nonroad engines, such as regulations on hours of usage, daily mass emission limits, or sulfur limits on fuel; nor are permits regulating such operations precluded, once the engine is no longer new.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (d) ~~No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.~~
3. The word "in" will be removed from the second sentence to be consistent with 326 IAC 2-7-15(a).

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed ~~in~~ compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.
4. IDEM's address has been changed and OES's address has been added throughout the permit as shown:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**
5. The statement about operating control not being federally enforceable has been removed from Condition D.1.3 since the requirement is part of a permit that is federally enforceable and it has been approved into the State Implementation Plan (SIP).

D.1.3 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating 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. ~~This requirement to operate the control is not federally enforceable.~~

6. Table of Contents section of the permit has been revised accordingly.
7. The signature delegation on the cover page of the permit has been changed as follows:

Operation Permit No.: T093-20665-00010	
Issued by: Paul Dubonetzky, Assistant Commissioner Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Manchester Tank and Equipment Company
Source Location:	905 "X" Street, Bedford, Indiana 47421
County:	Lawrence
SIC Code:	3443
Operation Permit No.:	T093-14395-00010
Operation Permit Issuance Date:	November 2, 2000
Permit Renewal No.:	T093-20665-00010
Permit Reviewer:	KSR / EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Manchester Tank and Equipment Company relating to the operation of metal pressure vessels manufacturing plant.

History

On February 1, 2005, Manchester Tank and Equipment Company Submitted an application to the OAQ requesting to renew the existing Title V permit. Manchester Tank and Equipment Company was issued a Part 70 permit on November 2, 2000.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) paint spray booth, identified as #7, constructed in 1987, utilizing an air atomization system, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C4.
- (b) One (1) paint spray booth, identified as PP1, constructed in July, 2001, utilizing an airless and air-assisted airless system, using dry filters for particulate matter overspray control, and exhausting to two (2) stacks, identified as PP-01 and PP-02.
- (c) One (1) natural gas fired bake oven, identified as BkO1, constructed in July, 2001, with a maximum heat input capacity of 1.65 million British thermal units per hour (MMBtu/hr), equipped with a low NOx burner, for drying the coated tanks from spray booth PP1, with emissions exhausting to stacks BkO-01 and BkO-02.
- (d) One (1) pneumatic blasting operation, identified as SB1, constructed in July, 2001, utilizing dry filters for particulate matter control, exhausting to one (1) stack, identified as SB-01; and
- (e) One (1) metal oxyfuel/plasma cutting machine, identified as PC-1, constructed in 2005, used for cutting mild steel, aluminum and stainless steel, controlled by six (6) cartridge filters.

Emission Units and Pollution Control Equipment Removed From This Source

The following permitted emission units have been removed from this source:

One (1) metalizing process, identified as MP1, coating a maximum of 42 square feet of steel tanks per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as MP-01.

Unpermitted Emission Units and Pollution Control Equipment

The following insignificant activities which have been added to the source do not result in increase above New Source Review (NSR) levels:

- (a) One (1) mixing unit consisting of four (4) 5 gallon containers which emit less than fifteen pounds of VOC per day.
- (b) One (1) Binks 2001 air operated gun paint pot applying surface coatings with application rate of 55 gallons per year.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (1) One (1) furnace at 660 thousand Btu per hour,
 - (2) One (1) furnace at 6.6 million Btu per hour,
 - (3) One (1) furnace at 80 thousand Btu per hour,
 - (4) One (1) furnace at 65 thousand Btu per hour,
 - (5) One (1) furnace at 85 thousand Btu per hour,
 - (6) One (1) furnace at 120 thousand Btu per hour;
 - (7) One (1) furnace at 120 thousand Btu per hour,
 - (8) One (1) furnace at 120 thousand Btu per hour;
 - (9) One (1) water heater at 40 thousand Btu per hour,
 - (10) One (1) dry-off oven, identified as NDO1, equipped with a low-NOx burner, rated at 0.5 MMBtu/hr and exhausting to one (1) stack, identified as NDO-01; and
 - (11) Two (2) water heaters, equipped with low-NOx burners, each rated at 1.5 MMBtu/hr.
- (b) Combustion source flame safety purging on startup;
- (c) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (d) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (e) Degreasing operations performed with an aqueous-based phosphate cleaner (consists of an aqueous parts washer, identified as NW1 and exhausting to four (4) stacks, NW-01 to NW-04);
- (f) The following equipment related to manufacturing activities resulting in the emission of HAPs below insignificant emission levels: brazing equipment, cutting torches, soldering equipment, and welding equipment;
 - (1) Welding operations with PM-10 emission less than twenty-five (25) pounds per day, [326 IAC 6-3-1(b) (14)]
- (g) Process vessel degassing and cleaning to prepare internal repairs;
- (h) Paved and unpaved roads and parking lots with public access;
- (i) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;

- (j) Other categories with emissions below insignificant thresholds:
 - (1) One (1) plate burner with PM-10 emissions less than twenty-five (25) pounds per day, [326 IAC 6-3-1(b) (14)]
 - (2) One (1) hole burner with PM-10 emissions less than twenty-five (25) pounds per day, [326 IAC 6-3-1(b) (14)]
 - (3) One (1) fork lift operation utilizing multiple forklifts with PM-10 emissions less than twenty-five (25) pounds per day, [326 IAC 6-3-1(b) (14)] and
 - (4) Aerosol spray paint cans with VOC emissions less than fifteen (15) pounds per day.

- (k) One (1) 2 gallon Binks paint pot with a Devilbiss JGA-510 paint gun and SC Binks wand with a 360 circular tip, applying surface coatings with maximum primer and finish coat application rates of 0.078 and 0.079 gallons per hour, respectively.

Existing Approvals

The source was issued a Part 70 Operating Permit No. T093-7549-00010 on November 2, 2000. The source has since received the following:

- (a) First Minor Source Modification 093-14347-0010, issued on June 12, 2001;
- (b) First Minor Permit Modification 093-14395-0010, issued on July 24, 2001;
- (c) First Administrative Amendment 093-14249-00010 issued on August 9, 2001;
- (d) Second Minor Source Modification 093-14654-00010 issued on August 23, 2001;
- (e) Second Minor Permit Modification 093-14759-00010 issued on October 16, 2001;
- (f) Second Administrative Amendment 093-15412-00010 issued on May 13, 2002;
- (g) First Interim Permit 093-195711-00010 issued on September 27 2004;
- (h) Third Minor Source Modification 093-19571-00010 issued on November 24, 2004; and
- (i) Third Minor Permit Modification 093-19707-00010 issued on March 03, 2005.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit 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 February 04, 2005. Additional information was received on June 17, 2005, June 20, 2005, August 4, 2005, September 2, 2005 and September 6, 2005.

Emission Calculations

See Appendix A of this document for detailed emission calculations (Appendix A, pages 1 through 15).

Potential To Emit of the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

The source was issued a Part 70 Operating Permit on November 2, 2000. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating	16.61	16.61	0.00	12.00	0	0	Single = 9.90 (Glycol Ether) Total = 10.07
Natural Gas Combustion	0.04	0.17	0.01	0.12	1.9	1.13	Single = 0.00 Total = 0.00
Blasting Operation	11.3*	93.76	0.00	0.00	0.00	0.00	Single = 0.00 Total = 0.00
Plasma Cutting	21.99	21.99	0.00	0.00	0.00	0.00	Single = 0.31 (Manganese) Total = 0.71
Insignificant Activities	2.8	3.03	0.02	9.06	3.27	3.89	Total = 0.77
Total PTE	52.74	135.56	0.03	21.18	5.17	5.02	Single = 9.90 (Glycol Ether) Total = 11.55

* Based on control required in previous permit

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) 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.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	0
PM-10	0
SO ₂	NA
VOC	7
CO	NA
NO _x	NA
HAP (specify)	NA

County Attainment Status

The source is located in Lawrence County.

Pollutant	Status
PM2.5	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 (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 emissions and NOx are considered when evaluating the rule applicability relating to ozone. Lawrence County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NOx 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.
- (b) Lawrence County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established 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 PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.
- (c) Lawrence County has been classified as attainment or unclassifiable in Indiana for all other 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.
- (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.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) This Part 70 source is not subject to the provisions of 40 CFR 64, Compliance Assurance Monitoring. In order for this rule to apply, a pollutant specific emissions unit as defined in 40 CFR 64.1 must meet the following three criteria for a given pollutant:
 - (1) with the potential to emit before controls equal to or greater than the major source threshold for a regulated pollutant,
 - (2) that is subject to an emission limitation or standard for a regulated pollutant, and
 - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

There are no pollutant specific emission units that meet the above criteria, therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source.

- (b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this permit for this source.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) included in this permit for this source.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants, Subpart M (Miscellaneous Metal Parts and Products), 40 CFR 63 are not included in the permit for this metal pressure vessels manufacturing plant because the source is not a major source of HAP. The potential of emit of any combination of HAPs and any single HAP is less than 25 and 10 tons per year, respectively.
- (e) The requirements of the National Emission Standards for Halogenated Solvent Cleaning, Subpart T, 40 CFR 63 are not included in the permit for the degreasing operation because the source is not a major source of HAP. The potential of emit of any combination of HAPs and any single HAP is less than 25 and 10 tons per year, respectively.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on December 12, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

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

This source has potential emissions of PM, PM-10, SO₂, NO_x, VOC, and CO of less than 250 tons per year. The source was constructed in 1958. All modifications to this source after the rule applicability date of August 7, 1977, had potential emissions less than the PSD major modification thresholds and the source is not one of the 28 source categories. Therefore, this source is not subject to the requirements of 326 IAC 2-2 and remains a minor source under this rule.

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2006 and every 3 years after. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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 this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) 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 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the two (2) paint booths (identified as #7 and PP1) and one (1) metal oxyfuel/plasma cutting will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability - Individual Facilities

326 IAC 4-2-2 (Bake oven and Dry-off oven: requirements)

The bake oven, identified as BkO1 and the dry-off oven, identified as NDO1 are not subject to this rule because these units are direct fired units, not an incinerator.

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

Pursuant to 326 IAC 6-3-2(d), particulate from the two (2) paint booths (#7 and PP1) shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.

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

Pursuant to 326 IAC 6-3-2 the particulate matter (PM) from the pneumatic blasting operation shall be limited by the following:

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

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

$$E = 4.10 (3.11)^{0.67} = 8.78 \text{ lbs PM/hr}$$

Based on the above equation, particulate matter emissions from the pneumatic blasting operation, identified as SB1 shall be limited to 8.78 pounds per hour when operating at a maximum process rate of 1000 pounds per hour.

Compliance calculation:

$$(109.02 \text{ tons PM/yr}) * (\text{yr}/8760 \text{ hrs}) * (2000 \text{ lbs/ton}) = 24.89 \text{ lbs PM/hr}$$

Controlled Compliance Calculation:

$$(0.11 \text{ tons PM/yr}) * (\text{yr}/8760 \text{ hrs}) * (2000 \text{ lbs/ton}) = 0.03 \text{ lbs PM/hr}$$

The dry filters shall be in operation at all times the pneumatic blasting operation, identified as SB1 is in operation, in order to comply with this limit.

- (b) Pursuant to 326 IAC 6-3-1(b)(10), the metal oxyfuel/plasma cutting machine is exempt from particulate emission limitations for manufacturing processes because less than three thousand four hundred (3,400) inches per hour of stock, one (1) inch thick or less, is cut.
- (c) The potential to emit of particulate emissions from welding, plate burner, hole burner and fork lift operations are less than 0.551 pounds per hour (See Appendix A, pages 11 through 13). Pursuant to 326 IAC 6-3-1(b)(14), all these units are exempt from particulate emission limitations for manufacturing processes.
- (d) The paint pot operation at the source applies coating less than five (5) gallons per day. Therefore, the requirements of 326 IAC 6-3-2 do not apply to this operation.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

- (a) 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 the two (2) spray booths (identified as PP1 and #7) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for 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.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

- (b) The requirement of 326 IAC 8-2-9 do not apply to Binks paint pot systems because the daily actual VOC emissions are less than 15 lb/day.

326 IAC 8-3-2 (Cold Cleaner Operations) and 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The degreasing operation is not subject to these rules because it does not use organic solvent.

Testing Requirements

While IDEM may require compliance testing at any time to determine if the source is in compliance with an applicable limit or standard, compliance testing is not required for this permit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to paint spray booths (PP1 and #7) are as follows:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, the Permittee shall monitor the pressure drop across the dry filters twice per day when one or more of the paint booths are in operation. The pressure drop shall remain within the range established by the manufacturer's specifications.
- (b) The Permittee shall, on a weekly basis, monitor surface coating booth stacks PP-01, PP-02 and C4 for evidence of visible emissions while one or more of the booths are in operation. During this inspection, the Permittee shall also inspect the nearby ground for the presence of overspray.
- (c) The Permittee, shall, on a semiannual basis, monitor for the presence of overspray on the rooftops.
- (d) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dry filters for the paint booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations).

Conclusion

The operation of this metal pressure vessels manufacturing plant shall be subject to the conditions of this Part 70 permit **T093-20665-00010**.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Company Name: Manchester Tank and Equipment Company
Address City IN Zip: 905 "X" Street, Bedford, Indiana 47421
Permit Number: T093-20665-00010
Plt ID: 093-00010
Reviewer: Surya Ramaswamy/EVP
Date: 9/7/05

Material	Emission Unit	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pot Gal/hour	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC (ton/yr)	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Flushing Solvent	Mixing unit	7.1	100.00%	0.0%	100.0%	0.0%	0.00%	788	8760	0.090	7.13	7.13	0.64	15.39	2.81	0.00	#DIV/0!	90%
90 Virginia White 2K Acrylic Enamel	Mixing unit	10.9	31.43%	0.0%	31.4%	0.0%	0.00%	561	8760	0.064	3.44	3.44	0.22	5.28	0.96	0.53	#DIV/0!	75%
90 Light Grey 2K Acrylic Enamel	Mixing unit	10.1	33.90%	0.0%	33.9%	0.0%	0.00%	631	8760	0.072	3.44	3.44	0.25	5.94	1.08	0.53	#DIV/0!	75%
Hardener for Ultrasolid	Mixing unit	8.0	44.19%	0.0%	44.2%	0.0%	0.00%	648	8760	0.074	3.52	3.52	0.26	6.25	1.14	0.36	#DIV/0!	75%
Buff Alkyd Primer	Mixing unit	11.6	28.98%	0.0%	29.0%	0.0%	0.00%	718	8760	0.082	3.36	3.36	0.28	6.62	1.21	0.74	#DIV/0!	75%

State Potential Emissions **Add worst case coating to all solvents** **1.65 39.49 7.21 2.16**

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

VOC and HAP

From Surface Coating Operations

Company Name: Manchester Tank and Equipment Company
 Address City IN Zip: 905 "X" Street, Bedford, Indiana 47421
 Permit Number: T093-20665-00010
 Plt ID: 093-00010
 Reviewer: Surya Ramaswamy/EVP
 Date: 9/7/05

VOC Emissions:

Coating	Emission Unit	lb/gal	gal/hr	Fraction VOC	tons VOC/yr
Primer	Paint Pot	12.63	0.078	0.32	1.38
Finish Coating	Paint Pot	10.9	0.079	0.07	0.26
Total					1.64

PM/PM10 Emissions:

Emission Factor, lb/hr	Hours of Operation, hr/yr	Emission, lb/yr	Emission, tpy
0.13	8760	1138.8	0.57

HAP Emission:

Coating	Emission Unit	lb/gal	gal/hr	Fraction HAP	tons HAP/yr
Primer	Paint Pot	12.63	0.078	0.17	0.73
Finish Coating	Paint Pot	10.9	0.079	0.00	0.00
Total					0.73

METHODOLOGY

X lb/gal * X gal/hr * Fraction VOC * 8760 hr/yr * 1/2000 ton/lb = tons VOC/yr
 X lb/gal * X gal/hr * Fraction HAP * 8760 hr/yr * 1/2000 ton/lb = tons HAP/yr

HAP Emission Calculations

Company Name: Manchester Tank and Equipment Company
 Address City IN Zip: 905 "X" Street, Bedford, Indiana 47421
 Permit Number: T093-20665-00010
 Pit ID: 093-00010
 Permit Reviewer: Surya Ramaswamy/EVP
 Date: 9/7/05

Material	Emission Unit	Density (Lb/Gal)	Gallons of Material (gal/year)	(hour/year)	(gal/hour)	Weight % Xylene	Weight % Toluene	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)
20 Gray Water Based Acrylic Enamel	#7	10.0	4906	8760	0.6	0.00%	0.00%	0.00%	0.00	0.00	0.00
20 Gray Green Water Based Acrylic Enamel	#7	9.6	876	8760	0.1	0.00%	0.00%	0.00%	0.00	0.00	0.00
Flat White Water-Based Primer	PP1	11.0	399	8760	0.05	0.00%	0.00%	10.00%	0.00	0.00	0.22
Flat Manchester Dark Grey	PP1	10.8	11563	8760	1.32	0.00%	0.00%	10.00%	0.00	0.00	6.22
Flat Slate Grey Water Based Primer	PP1	10.9	5081	8760	0.58	0.00%	0.00%	10.00%	0.00	0.00	2.76
Red Oxide Water-Based Primer	PP1	10.0	543	8760	0.06	0.00%	0.00%	5.00%	0.00	0.00	0.14
Black Water-Based Primer	PP1	9.0	1577	8760	0.18	0.00%	0.00%	8.00%	0.00	0.00	0.57
Flushing Solvent	Mixing unit	7.1	788	8760	0.09	0.00%	0.00%	0.00%	0.00	0.00	0.00
90 Virginia White 2K Acrylic Enamel	Mixing unit	10.9	561	8760	0.06	0.00%	0.00%	0.00%	0.00	0.00	0.00
90 Light Grey 2K Acrylic Enamel	Mixing unit	10.1	631	8760	0.07	0.00%	0.00%	0.00%	0.00	0.00	0.00
Hardener for Ultrasolid	Mixing unit	8.0	648	8760	0.07	0.00%	0.00%	0.00%	0.00	0.00	0.00
Buff Alkyd Primer	Mixing unit	11.6	718	8760	0.08	0.50%	0.50%	0.00%	0.02	0.02	0.00

*Note: Coatings will be added in future

Total State Potential Emissions

0.02 0.02 9.90

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 h

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

Company Name: Manchester Tank and Equipment Company
Address City IN Zip: 905 "X" Street, Bedford, Indiana 47421
Permit Number: T093-20665-00010
Pit ID: 093-00010
Reviewer: Surya Ramaswamy/EVP
Date: 9/7/05

Emission Unit	Rating (MMBtu/hr)
Natural Gas Bake Oven (BK01)	1.65
Dry-Off Oven (NDO-01)	0.5
Water Heater #1	1.5
Water Heater #2	1.5
Total Heat Input Capacity (MMBtu/hr)	5.150

Potential Throughput
MMCF/yr

45.1

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	50.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.043	0.171	0.014	1.128	0.124	1.895

*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

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 next page for HAPs emissions calculations.

updated 4/99

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

HAPs Emissions

Company Name: Manchester Tank and Equipment Company

Address City IN Zip: 905 "X" Street, Bedford, Indiana 47421

Permit Number: T093-20665-00010

Plt ID: 093-00010

Reviewer: Surya Ramaswamy/EVP

Date: 9/7/05

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.737E-05	2.707E-05	1.692E-03	4.060E-02	7.669E-05

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	1.128E-05	2.481E-05	3.158E-05	8.572E-06	4.737E-05

Methodology is the same as on previous page.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Abrasive Blasting - Confined**

Company Name: Manchester Tank and Equipment Company
Address City IN Zip: 800-900 X Street, Bedford, IN 47421
Permit Number: T093-20665-00010
Plt ID: 093-00010
Reviewer: SR / EVP

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)						
	30	40	50	60	70	80	90
1/8	28	35	42	49	55	63	70
3/16	65	80	94	107	122	135	149
1/4	109	138	168	195	221	255	280
5/16	205	247	292	354	377	420	462
3/8	285	355	417	477	540	600	657
7/16	385	472	560	645	755	820	905
1/2	503	615	725	835	945	1050	1160
5/8	820	990	1170	1336	1510	1680	1850
3/4	1140	1420	1670	1915	2160	2400	2630
1	2030	2460	2900	3340	3780	4200	4640

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)
FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =
D = Density of abrasive (lb/ft3) From Table 2 =
D1 = Density of sand (lb/ft3) =
ID = Actual nozzle internal diameter (in) =
ID1 = Nozzle internal diameter (in) from Table 3 =

1265
487
99
0.5
0.5

Flow Rate (FR) (lb/hr) = 6222.778

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =
FR = Flow Rate (lb/hr) =
w = fraction of time of wet blasting =
N = number of nozzles =

0.004
6222.778
0
1

Uncontrolled PM Emissions =	24.89 lb/hr
	109.02 ton/yr
Uncontrolled PM10 Emissions =	21.41 lb/hr
	93.76 ton/yr

Controlled PM Emissions =	0.11 ton/yr
Controlled PM10 Emissions =	0.09 ton/yr

Note: PM/PM10 emissions are controlled by dry filters with a removal efficiency of 99.9%

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)
Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs

Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)² x (D/D1)

E = EF x FR x (1-w/200) x N

w should be entered in as a whole number (if w is 50%, enter 50)

s (lb/ft³)

100
77
165
309
507
720
940
1265
2030
2880
5060

per nozzle

%

Appendix A: Emissions Calculations

Metal Oxyfuel/Plasma Cutting Machine

Company Name: Manchester Tank and Equipment Company
 Address City IN Zip: 905 X Street, Bedford, Indiana 47421
 Permit Number: 093-20665-00010
 Plt ID: 093-00010
 Reviewer: Surya Ramaswamy / EVP
 Date: 9/7/05

Plasma Cutting

Emission Factors (lb/hr cutting)			
Pollutant	Mild Steel	Aluminum	Stainless Steel
PM	1.70E+00	5.02E+00	1.28E+00
Arsenic	1.70E-04	1.54E-03	1.23E-03
Cadmium	1.18E-05	7.48E-07	0.00E+00
Chromium	5.80E-05	2.65E-04	5.85E-02
Manganese	1.60E-02	8.76E-04	7.08E-02
Nickel	4.04E-04	7.03E-05	3.05E-02
Phosphorus	7.00E-04	7.38E-04	4.21E-04
Lead	1.17E-04	7.88E-05	2.89E-06
Antimony	5.05E-06	8.07E-05	0.00E+00
Selenium	5.48E-05	8.07E-06	5.11E-05

Note: Emission factors (lb/hr cutting) are supplied by manufacturer.

Pollutant	Uncontrolled						Controlled		
	Emission Rate in lb/yr			Emission Rate in ton/yr cutting			Emission Rate in ton/yr cutting		
	Mild Steel	Aluminum	Stainless Steel	Mild Steel	Aluminum	Stainless Steel	Mild Steel	Aluminum	Stainless Steel
PM	14892.00	43975.20	11212.80	7.45	21.99	5.61	0.07	0.22	0.06
Arsenic	1.49	13.49	10.77	7.45E-04	6.75E-03	5.39E-03	7.45E-06	6.75E-05	5.39E-05
Cadmium	0.10	0.01	0.00	5.17E-05	3.28E-06	0.00E+00	5.17E-07	3.28E-08	0.00E+00
Chromium	0.51	2.32	512.46	2.54E-04	1.16E-03	2.56E-01	2.54E-06	1.16E-05	2.56E-03
Manganese	140.16	7.67	620.21	7.01E-02	3.84E-03	3.10E-01	7.01E-04	3.84E-05	3.10E-03
Nickel	3.54	0.62	267.18	1.77E-03	3.08E-04	1.34E-01	1.77E-05	3.08E-06	1.34E-03
Phosphorus	6.13	6.46	3.69	3.07E-03	3.23E-03	1.84E-03	3.07E-05	3.23E-05	1.84E-05
Lead	1.02	0.69	0.03	5.12E-04	3.45E-04	1.27E-05	5.12E-06	3.45E-06	1.27E-07
Antimony	0.04	0.71	0.00	2.21E-05	3.53E-04	0.00E+00	2.21E-07	3.53E-06	0.00E+00
Selenium	0.48	0.07	0.45	2.40E-04	3.53E-05	2.24E-04	2.40E-06	3.53E-07	2.24E-06
HAP Total	153.48	32.04	1414.78	7.67E-02	1.60E-02	7.07E-01	7.67E-04	1.60E-04	7.07E-03

Worst case HAP = Manganese

Emission Factors supplied by manufacturer.

The metal oxyfuel/plasma cutting machine consists of one (1) plasma torch and two (2) oxyfuel torches. It has the ability to cut using one plasma torch, one oxyfuel torch, or two oxyfuel torches simultaneously. Potential emissions provided for the plasma cutting torch is the worst case scenario for this cutting machine.

Potential emissions based on assumption that each material is used 8,760 hours.

Controlled emissions based on cartridge filter control efficiency of 99.0 %

Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Company Name: Manchester Tank and Equipment Company
Address City IN Zip: 800-900 X Street, Bedford, IN 47421
CP: 093-20665
Pit ID: 093-00010
Reviewer: Surya Ramaswamy / EVP

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

8.89

77.9

Facilities	MMBtu/hr
Main Furnace	6.6
Furnace(7)	1.25
Water Heater (2)	1.04
Total	8.89

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.07	0.30	0.02	3.89	0.21	3.27

*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

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

**MANCHESTER TANK EQUIPMENT CO.
BURNING EMISSIONS**

Appendix A: Emissions Calculations

Burner - Insignificant Activity

Company Name: Manchester Tank and Equipment Company
Address City IN Zip: 800-900 X Street, Bedford, IN 47421
CP: 093-20665
Plt ID: 093-00010
Reviewer: Surya Ramaswamy / EVP

Emission Unit	Throughput (lbs/yr)	Metal Cut (lbs/yr)	PM/PM10 Emission Factor	Actual Emissions			Allowable Emissions
				(lbs/yr)	(lbs/day)	(lbs/hr)	(lbs/hr)
Plate Burner	2,106,143	210,614	15.7	3307	9.06	0.38	0.99
Hole Burner	1,400,604	140,060	15.7	2199	6.02	0.25	0.75

Note: It is assumed that 10% of the metal throughput is burned.

Methodology:

Metal Cut (lbs/hr) = 10% x Throughput (lbs/hr)

Emissions (lbs/yr) = Metal Cut (lbs/yr) x PM/PM10 Emission Factor (lbs/1000 lbs metal cut)

Emissions (lbs/hr) = Emissions (lbs/yr) x 1 yr/8,760 hrs

Allowable Emissions (lbs/hr) = 4.1x (Throughput (lbs/yr) x 1 yr/8,760 hrs x 1 ton/2,000 lbs)^{0.67}

Emission factors are from Fire 6.24

Appendix A: Emission Calculations

Company Name: Manchester Tank and Equipment Company
Address City IN Zip: 905 "X" Street, Bedford, Indiana 47421
Permit No.: T093-20665-00010
Reviewer: Surya Ramaswamy / EVP
Date: 9/7/05

Uncontrolled Potential Emissions (tons/year)						
Emissions Generating Activity						
Pollutant	Surface Coating	Natural Gas Combustion	Blasting Operation	Plasma Cutting	Insignificant Activities *	TOTAL
Emission Unit	#7 and PP1	Natural Gas Bake Oven, Dry-Off Oven, Water Heater #1 and Water Heater #2	SB-1	Plasma Cutting	Mixing Unit, Paint Pot & Insignificant Furnace	
PM	16.61	0.04	109.02	21.99	2.80	150.46
PM10	16.61	0.17	93.76	21.99	3.03	135.56
SO2	0.00	0.01	0.00	0.00	0.02	0.03
NOx	0.00	1.13	0.00	0.00	3.89	5.02
VOC	12.00	0.12	0.00	0.00	9.06	21.18
CO	0.00	1.90	0.00	0.00	3.27	5.17
total HAPs	10.07	0.00	0.00	0.71	0.77	11.55
worst case single HAP	(Glycol Ether) 9.9	0.00	0.00	(Manganese) 0.31	-	(Glycol Ether) 9.9
Total emissions based on rated capacity at 8,760 hours/year.						
Controlled Potential Emissions (tons/year)						
Emissions Generating Activity						
Pollutant	Surface Coating	Natural Gas Combustion	Blasting Operation	Plasma Cutting	Insignificant Activities *	TOTAL
Emission Unit	#7 and PP1	Natural Gas Bake Oven, Dry-Off Oven, Water Heater #1 and Water Heater #2	SB-1	Plasma Cutting	Mixing Unit, Paint Pot & Insignificant Furnace	
PM	0.16	0.04	0.11	0.22	2.80	3.33
PM10	0.16	0.17	0.09	0.22	3.03	3.67
SO2	0.00	0.01	0.00	0.00	0.02	0.03
NOx	0.00	1.13	0.00	0.00	3.89	5.02
VOC	12.00	0.12	0.00	0.00	9.06	21.18
CO	0.00	1.90	0.00	0.00	3.27	5.17
total HAPs	10.07	0.00	0.00	0.01	0.77	10.85
worst case single HAP	(Glycol Ether) 9.9	0.00	0.00	(Manganese) 0.0031	-	(Glycol Ether) 9.9

Total emissions based on rated capacity at 8,760 hours/year, after control.

* Insignificant Activities include emissions from clean-up operations and emergency generators

Company Name: Manchester Tank and Equipment Company
Address City IN Zip: 905 "X" Street, Bedford, Indiana 47421
Permit Number: T093-20665-00010
Plt ID: 093-00010
Permit Reviewer: Surya Ramaswamy/EVP
Date: 9/7/05

Emission Unit	Xylene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Toluene Emissions (ton/yr)	Arsenic (ton/yr)	Cadmium (ton/yr)	Chromium (ton/yr)	Manganese (ton/yr)	Nickel (ton/yr)
#7	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
PP1	0.000	9.901	0.000	0.000	0.000	0.000	0.000	0.000
Plasma Cutting	0.0000	0.0000	0.0000	0.007	0.000	0.026	0.310	0.000
Total	0.000	9.901	0.000	0.007	0.000	0.026	0.310	0.000

**MANCHESTER TANK EQUIPMENT CO.
WELDING EMISSIONS**

Appendix A: Emissions Calculations

Welding - Insignificant Activity

Company Name: Manchester Tank and Equipment Company
Address City IN Zip: 800-900 X Street, Bedford, IN 47421
CP: 093-20665
Plt ID: 093-00010
Reviewer: Surya Ramaswamy / EVP

Welding Type	Weld Wire Usage (1000)	Emission Factors (lb/1000 lbs electorde)				
		PM/ PM10	Cr	Co	Mn	Ni
Gas Metal Arc Welding (L-50 and L-56)	0.1324512	5.200	0.001	0.001	0.318	0.001
Submerged Arc Welding	10.933181	0.050	0.000	0.000	0.000	0.000
Flux Cored Arc Welding	44.01024	20.800	0.002	0.000	2.020	0.112

Welding Type	Emissions (tons/yr)				
	PM/ PM10	Cr	Co	Mn	Ni
Gas Metal Arc Welding (L-50 and L-56)	0.028	0.000	0.000	0.002	0.000
Submerged Arc Welding	0.001	0.000	0.000	0.000	0.000
Flux Cored Arc Welding	0.000	0.000	0.000	0.000	0.000
Total	0.030	0.000	0.000	0.002	0.000

Note: Emission factors are from Fire 6.24
Throughput is less than 100 lb/hr; therefore, allowable PM emissions are 0.551 lb/hr.

Methodology:

Emissions (tons/yr) = Usage (1,000 lbs/yr) x Emission Factor (lb/1,000 lb electrode) x 1 ton/2,000 lbs

**MANCHESTER TANK EQUIPMENT CO.
FORKLIFT EMISSIONS**

Appendix A: Emissions Calculations

Fork Lifting - Insignificant Activity

Company Name: Manchester Tank and Equipment Company
Address City IN Zip: 800-900 X Street, Bedford, IN 47421
CP: 093-20665
Plt ID: 093-00010
Reviewer: Surya Ramaswamy / EVP

Pollutant	Constants			
	s	k	a	b
PM	6	4.9	0.7	0.45
PM10	6	1.5	0.9	0.45

Fork Lift #	Weight of Fork Lift (tons)	Hours Operated per Day	Miles per Hour	Total Miles Travelled	PM		PM10		
					Emissions (lb/VMT)	Emissions (lb/day)	Emissions (lb/VMT)	Emissions (lb/day)	Emissions (lb/hr)
# 1	2.5	7.47	5	3.74	2.78	10.38	0.74	2.77	0.12
# 2	2.5	11.25	5	5.63	2.78	15.63	0.74	4.17	0.17
# 3	0.5	1.36	5	0.68	1.35	0.92	0.36	0.24	0.01
# 4	3	5.27	5	2.63	3.02	7.95	0.80	2.12	0.09
# 6	2.5	1.37	5	0.69	2.78	1.91	0.74	0.51	0.02
# 7	1.8	3.51	5	1.76	2.42	4.24	0.64	1.13	0.05
# 9	2.5	4.91	5	2.45	2.78	6.82	0.74	1.82	0.08
# 11	2.5	7.05	5	3.52	2.78	9.79	0.74	2.61	0.11
# 12	3.85	3.31	5	1.66	3.37	5.59	0.90	1.49	0.06
# 13	2.5	2.43	5	1.22	2.78	3.38	0.74	0.90	0.04
# 14	2.5	2.09	5	1.05	2.78	2.91	0.74	0.77	0.03
# 15	2.5	7.85	5	3.93	2.78	10.91	0.74	2.91	0.12
#16	3	5.06	5	2.53	3.02	7.63	0.80	2.03	0.08

Note: Equation and constants from AP-42, 13.2.2

Methodology:

Emissions (lb/VMT) = $k \times (s/12)^a \times (W/3)^b$

Where: VMT is Vehicle Miles Travelled
s is surface material silt content, Plant Road for Steel Production
W is mean vehicle weight in tons
for PM, k = 4.9, a = 0.7, b = 0.45
for PM10, k = 1.5, a = 0.9, b = 0.45

Appendix A: Emission Calculations

Company Name: Manchester Tank and Equipment Company
Address City IN Zip: 905 "X" Street, Bedford, Indiana 47421
Permit No.: T093-20665-00010
Reviewer: Surya Ramaswamy / EVP
Date: 9/7/05

Uncontrolled Potential Emissions (tons/year)						
Emissions Generating Activity						
Pollutant	Surface Coating	Natural Gas Combustion	Blasting Operation	Plasma Cutting	Insignificant Activities *	TOTAL
Emission Unit	#7 and PP1	Natural Gas Bake Oven, Dry-Off Oven, Water Heater #1 and Water Heater #2	SB-1	Plasma Cutting	Mixing Unit, Paint Pot & Insignificant Furnace	
PM	16.61	0.04	109.02	21.99	2.80	150.46
PM10	16.61	0.17	93.76	21.99	3.03	135.56
SO2	0.00	0.01	0.00	0.00	0.02	0.03
NOx	0.00	1.13	0.00	0.00	3.89	5.02
VOC	12.00	0.12	0.00	0.00	9.06	21.18
CO	0.00	1.90	0.00	0.00	3.27	5.17
total HAPs	10.07	0.00	0.00	0.71	0.77	11.55
worst case single HAP	(Glycol Ether) 9.9	0.00	0.00	(Manganese) 0.31	-	(Glycol Ether) 9.9
Total emissions based on rated capacity at 8,760 hours/year.						
Controlled Potential Emissions (tons/year)						
Emissions Generating Activity						
Pollutant	Surface Coating	Natural Gas Combustion	Blasting Operation	Plasma Cutting	Insignificant Activities *	TOTAL
Emission Unit	#7 and PP1	Natural Gas Bake Oven, Dry-Off Oven, Water Heater #1 and Water Heater #2	SB-1	Plasma Cutting	Mixing Unit, Paint Pot & Insignificant Furnace	
PM	0.16	0.04	0.11	0.22	2.80	3.33
PM10	0.16	0.17	0.09	0.22	3.03	3.67
SO2	0.00	0.01	0.00	0.00	0.02	0.03
NOx	0.00	1.13	0.00	0.00	3.89	5.02
VOC	12.00	0.12	0.00	0.00	9.06	21.18
CO	0.00	1.90	0.00	0.00	3.27	5.17
total HAPs	10.07	0.00	0.00	0.01	0.77	10.85
worst case single HAP	(Glycol Ether) 9.9	0.00	0.00	(Manganese) 0.0031	-	(Glycol Ether) 9.9

Total emissions based on rated capacity at 8,760 hours/year, after control.

* Insignificant Activities include emissions from clean-up operations and emergency generators

Company Name: Manchester Tank and Equipment Company
Address City IN Zip: 905 "X" Street, Bedford, Indiana 47421
Permit Number: T093-20665-00010
Plt ID: 093-00010
Permit Reviewer: Surya Ramaswamy/EVP
Date: 9/7/05

Emission Unit	Xylene Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Toluene Emissions (ton/yr)	Arsenic (ton/yr)	Cadmium (ton/yr)	Chromium (ton/yr)	Manganese (ton/yr)	Nickel (ton/yr)
#7	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
PP1	0.000	9.901	0.000	0.000	0.000	0.000	0.000	0.000
Plasma Cutting	0.0000	0.0000	0.0000	0.007	0.000	0.026	0.310	0.000
Total	0.000	9.901	0.000	0.007	0.000	0.026	0.310	0.000