



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

TO: Interested Parties / Applicant  
DATE: January 17, 2006  
RE: Parker Hannifin / 111-22497-00019  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER-AM.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
*We make Indiana a cleaner, healthier place to live.*

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January 17, 2006

Mr. Dan Sayre  
Parker Hannifin  
715 S Iroquois St  
Goodland, IN 47948

Re: Exempt Construction and Operation Status,  
111-22497-00019

Dear Mr. Sayre:

The application from Parker Hannifin, received on January 4, 2006, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following stationary steel hydraulic and/or pneumatic cylinder surface coating plant, 715 S Iroquois St, Goodland, IN 47948, is classified as exempt from air pollution permit requirements:

- (a) one (1) paint booth, constructed in 1985, consisting of one (1) High Volume Low Pressure (HVLP) spray gun for application of paint to steel hydraulic and/or pneumatic cylinders at a maximum capacity of 9.25 cylinders per hour, controlled by dry filters, and exhausting through a stack to the atmosphere.

The following conditions shall be applicable:

- (a) Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (b) Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

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

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

If you have any questions on this matter, please contact Nathan C. Bell, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204, at 317-234-3350 or at 1-800-451-6027 (ext 43350).

Sincerely,

Origin signed by

Nysa L. James, Section Chief  
Permits Branch  
Office of Air Quality

ncb

cc: File - Newton County  
Newton County Health Department  
Air Compliance - Wanda Stanfield  
Permit Tracking  
Compliance Data Section  
Administrative and Development

Indiana Department of Environmental Management  
Office of Air Quality

**Technical Support Document (TSD) for an Exemption**

**Source Background and Description**

**Source Name:** Parker Hannifin  
**Source Location:** 715 S Iroquois St, Goodland, IN 47948  
**County:** Newton  
**SIC Code:** 3593 (Manufacturing of Fluid Power Cylinders and Actuators)  
3479 (Coating, Engraving, and Allied Services, Not Elsewhere Classified)  
**Operation Permit No.:** 111-22497-00019  
**Permit Reviewer:** Nathan C. Bell

The Office of Air Quality (OAQ) has reviewed an application from Parker Hannifin relating to the operation of a stationary steel hydraulic and/or pneumatic cylinder surface coating plant.

**Unpermitted Emission Units and Pollution Control Equipment**

The application includes information relating to the operation of the following unpermitted facilities:

- (a) one (1) paint booth, constructed in 1985, consisting of one (1) High Volume Low Pressure (HVLP) spray gun for application of paint to steel hydraulic and/or pneumatic cylinders at a maximum capacity of 9.25 cylinders per hour, controlled by dry filters, and exhausting through a stack to the atmosphere.

**Existing Approvals**

No previous air approvals have been issued to this source.

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Commissioner that the application be approved as an exemption. 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 January 4, 2006.

**Stack Summary**

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (scfm)	Temperature (°F)
Paint Booth	Paint Booth	30	2.83	12,000	ambient

## Emission Calculations

See Appendix A of this TSD for detailed emissions calculations.

## Potential to Emit Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	1.72
PM10	1.72
SO <sub>2</sub>	0
NO <sub>x</sub>	0
VOC	0.62
CO	0
TOTAL HAPs	0

- (a) The PTE (as defined in 326 IAC 2-1.1-1(16)) of regulated criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3.
- (b) The PTE (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3.

## County Attainment Status

The source is located in Newton County.

Pollutant	Status
PM10	Attainment or Unclassifiable
PM2.5	Attainment or Unclassifiable
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment or Unclassifiable
1-Hour Ozone	Attainment or Unclassifiable
8-Hour Ozone	Attainment or Unclassifiable
CO	Attainment or Unclassifiable
Lead	Attainment or Unclassifiable

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standard. Newton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO<sub>x</sub> 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) Newton County has been classified as attainment or unclassifiable in Indiana for all the 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.
- (c) Newton County has been classified as attainment or unclassifiable 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.
- (d) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

New Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	0.17
PM-10	0.17
SO <sub>2</sub>	0
NO <sub>x</sub>	0
VOC	0.62
CO	0
Worst Single HAP	0
Combination HAPs	0

- (a) This new source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

### Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the PTE of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

### Federal Rule Applicability

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

- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart M, Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63.3880 - 63.3981), because this source is not a major source of HAPs as defined in 40 CFR 63.2.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in the permit for this source.

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

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

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

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

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

#### 326 IAC 2-6 (Emission Reporting)

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

#### 326 IAC 5-1 (Opacity Limitations)

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

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

#### 326 IAC 6-4 (Fugitive Dust Emissions Limitations)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

### **State Rule Applicability – Individual Facilities**

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

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

### **State Rule Applicability - Surface Coating Operations**

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

Pursuant to 326 IAC 6-3-1(b)(14), the paint booth is exempt from the requirements of 326 IAC 6-3, because the potential particulate emissions are less than five hundred fifty-one thousandths (0.551) pound per hour.

#### **326 IAC 8-2-9 (Volatile Organic Compounds, Miscellaneous Metal Coating Operations)**

Pursuant to 326 IAC 8-2-1 (Applicability), this rule applies to facilities constructed after July 1, 1990 located in any county, and with actual VOC emissions of greater than fifteen (15) pounds per day before add-on controls. The requirements of 326 IAC 8-2-9 are not applicable to the paint booth, since the potential and actual VOC emissions are less than fifteen (15) pound per day.

### **Conclusion**

The operation of these facilities shall be subject to the conditions of the attached exemption, No 111-22497-00019.

**Appendix A: Emissions Calculations  
Emission Summary**

**Company Name:** Parker Hannifin  
**Address City IN Zip:** 715 S Iroquois St, Goodland, IN 47948  
**Permit Number:** 111-22497  
**Plt ID:** 111-00019  
**Reviewer:** Nathan C. Bell  
**Date:** January 12, 2005

<b>Uncontrolled Potential Emissions (tons/year)</b>			
Emissions Generating Activity			
Category	Pollutant	Paint Booth (TNT-PB)	TOTAL
Criteria Pollutants	PM	1.72	1.72
	PM10	1.72	1.72
	SO2	0	0
	NOx	0	0
	VOC	0.62	0.62
	CO	0	0
Hazardous Air Pollutants	none	0	0
	<b>Totals</b>	<b>0</b>	<b>0</b>
	<b>Worst Case HAP</b>	<b>0</b>	<b>0</b>

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

<b>Controlled Potential Emissions (tons/year)</b>			
Emissions Generating Activity			
Category	Pollutant	Paint Booth (TNT-PB)	TOTAL
Criteria Pollutants	PM	0.17	0.17
	PM10	0.17	0.17
	SO2	0	0
	NOx	0	0
	VOC	0.62	0.62
	CO	0	0
Hazardous Air Pollutants	none	0	0
	<b>Totals</b>	<b>0</b>	<b>0</b>
	<b>Worst Case HAP</b>	<b>0</b>	<b>0</b>

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

**Appendix A: Emissions Calculations  
Surface Coating**

**Company Name: Parker Hannifin  
Address City IN Zip: 715 S Iroquois St, Goodland, IN 47948  
Permit Number: 111-22497  
Plt ID: 111-00019  
Reviewer: Nathan C. Bell  
Date: January 12, 2005**

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

Operation and Material*	Primary Type of Surface Coated	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water + Non-VOCs	Weight % Solids	Weight % VOCs	Volume % Water + Non-VOCs	Volume % Solids	Usage (gal/unit)	Maximum Capacity (unit/hr)	Maximum Usage (gal/day)	Maximum Usage (lb/hr)	Pounds VOC per gallon of coating less water and non-VOCs	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (tons/yr)	PTE PM (lb/hr)	PTE PM (tons/yr)	lb VOC per gal solids	Transfer Efficiency
Aqualite Black WR Fast Dry	Steel	9.85	23.25%	12.08%	76.8%	11.17%	16.0%	70.0%	0.014	9.25	3.11	1.28	1.31	1.10	0.142	3.42	0.62	0.39	1.72	1.57	60%

**METHODOLOGY**

Maximum Usage (lbs/hr) = Maximum Usage (gal/day) \* Density (lb/gal) / (24 hour/day)  
 Maximum Usage (gal/day) = Usage (gallons/unit) \* Maximum Capacity (units/hour) \* 24 hours/day  
 Pounds of VOC per Gallon Coating less Water and non-VOCs = (Density (lb/gal) \* Weight % VOCs) / (1-Volume % water and non-VOCs)  
 Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % VOCs)  
 Potential VOC Pounds per Hour = Maximum Usage (lbs/hr) \* Weight % VOCs  
 Potential VOC Pounds per Day = Potential VOC (lbs/hr) \* (24 hours/day)  
 Potential VOC Tons per Year = Potential VOC (lbs/day) \* (365 days/yr) \* (1 ton/2000 lbs)  
 Particulate Potential Tons per Year = Density (lbs/gal) \* Maximum Usage (gal/day) \* (Weight % Solids) \* (1-Transfer efficiency) \* (365 days/yr) \* (1 ton/2000 lbs)  
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % VOCs) / (Volume % solids)  
 Controlled Potential to Emit = Uncontrolled Potential to Emit \* (1 - Control Efficiency)  
 Based on the MSDS for Aqualite Black WR Fast Dry, the material contains no hazardous air pollutants (HAPs)

<b>Total Uncontrolled Potential to Emit (PTE) =</b>	<b>0.14</b>	<b>3.4</b>	<b>0.62</b>	<b>0.39</b>	<b>1.72</b>
<b>Actual Emissions based on 16 hours per day =</b>	<b>0.14</b>	<b>2.3</b>			

<b>Dry Filter Control Efficiency =</b>	<b>90.0%</b>
<b>PM/PM10 Emissions after controls =</b>	<b>0.04 0.17</b>