INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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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: April 26, 2006

RE: Tuthill Corporation, Fill-Rite Division / 003-22518-00238

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 13-17-3-4 and 326 IAC 2, this approval 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 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-MOD.dot 03/23/06

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April 26, 2006

Mr. Russ Deter
Tuthill Corporation, Fill-Rite Division
8825 Aviation Drive
Fort Wayne, Indiana 46809

Re: 003-22518-00238
Second Minor Permit Revision to
MSOP 003-15783-00238

Dear Mr. Deter:

Tuthill Corporation, Fill-Rite Division was issued a Minor Source Operating Permit on July 29, 2002 for a stationary metal fluid pump coating source located at 8825 Aviation Drive, Fort Wayne, Indiana. A letter requesting a revision to this permit was received on January 17, 2006. Pursuant to the provisions of 326 IAC 2-6.1-6, a Minor Permit Revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of an airless spray gun to their existing booth, identified as B-1. The addition of this gun will provide the ability to apply a “dust coat” or tack–coat of paint to the pump prior to proceeding to the finished product. Also the modification shall address the increased overall capacity of the source, spray booths identified as B-1 through B-4, from one hundred (100) pumps per hour to one hundred fifty (150) pumps per hour. The removal of spray booth B-5 from the permit is required because Tuthill Corporation, Fill-Rite Division never constructed the spray booth within the eighteen (18) months, by September 12, 2005, of the issuance of MPR 003-18452-00238.

Pursuant to 326 IAC 2-6.1-6, the minor source operating permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this permit revision which includes this letter, the attached operating conditions applicable to these emission units, and for your convenience, the entire MSOP, with all revisions made to it, is being provided.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Brian J. Pedersen, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, at 631-691-3395, ext. 24 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Origin signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

BJP:MES
Attachments
cc: File - Allen County
U.S. EPA, Region V
Allen County Health Department
Air Compliance Section Inspector – Patrick Burton
Compliance Branch - Lynetta Brown-Glover
Administrative and Development Section
Technical Support and Modeling - Michele Boner

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CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

Tuthill Corporation, Fill-Rite Division
8825 Aviation Drive
Fort Wayne, Indiana 46809

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 003-15783-00238	
Issued by: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: July 29, 2002 Expiration Date: July 29, 2007

First Minor Permit Revision 003-18452-00238, issued March 12, 2004.

Second Minor Permit Revision 003-22518-00238	Conditions Affected: A.1 and A.2 Sections Affected: D.1
Issued by:Origin signed by Nisha Sizemore, Chief Office of Air Quality	Issuance Date:April 26, 2006 Expiration Date: July 29, 2007

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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 and A.2 are 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 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary metal fluid pump coating source.

Authorized Individual:	Russ Deter
Source Address:	8825 Aviation Drive, Fort Wayne, Indiana 46809
Mailing Address:	8825 Aviation Drive, Fort Wayne, Indiana 46809
Phone Number:	260-747-7529
SIC Code:	3561
County Location:	Allen County
County Status:	Nonattainment for 8-hour ozone Attainment for all remaining criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) Four (4) spray paint booths, known as B-1 through B-4, equipped with five (5) airless spray guns, known as A-1 through A-4, and A-6, and dry filters to control overspray, exhausting through Stacks B-1 through B-4, capacity: 150 pumps per hour, total.

(b) One (1) natural gas-fired waste water evaporator, known as EV-1, exhausting to Stack EV-1, heat input capacity: 0.353 million British thermal units per hour.

(c) One (1) natural gas-fired roof top heater, known as RTU-1, constructed in 1996, heat input capacity: 0.180 million British thermal units per hour.

(d) One (1) natural gas-fired roof top heater, known as RTU-2, constructed in 1996, heat input capacity: 0.080 million British thermal units per hour.

(e) Four (4) natural gas-fired roof top heaters, known as RTU-3 through RTU-6, constructed in 1996, heat input capacity: 0.250 million British thermal units per hour, each.

(f) One (1) natural gas-fired roof top heater, known as RTU-7, constructed in 1996, heat input capacity: 0.150 million British thermal units per hour.

(g) Three (3) natural gas-fired roof top heaters, known as RTU-8 through RTU-10, heat input capacity: 0.180 million British thermal units, each.

(h) Two (2) natural gas-fired air make up units, known as AMU-1 and AMU-2, constructed in 1996, heat input capacity: 8.25 million British thermal units per hour, each.

(i) One (1) self-contained dehydrator, known as D-1, capacity: 10 pounds of moisture removal per hour (no emissions).

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

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, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction of the new emission units is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled, “Minor Source Operating Permit”, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

(e) Pursuant to 326 IAC 2-6.1-7, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. If IDEM, OAQ, upon receiving a timely and complete 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 until the renewal permit has been issued or denied. The operation permit issued shall contain as a minimum the conditions in Section C and Section D of this permit.

B.7 Permit Term [326 IAC 2-6.1-7]

This permit is issued for a fixed term of five (5) years from the original date, 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.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21] [326 IAC 2-7]

(a) The total source potential to emit of VOC, PM ,PM_{10}, NO_X, SO_2 and CO are less than two hundred fifty (250) tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential to emit PM_{10}, SO_2, VOC, NO_X or CO to 100 tons per year from this source, shall cause this source to be considered a major source under 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

C.2 Hazardous Air Pollutants (HAPS) [326 IAC 2-7]

Any change or modification which may increase potential to emit to ten (10) tons per year of any single hazardous air pollutant, twenty-five (25) tons per year of any combination of hazardous air pollutants from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

C.3 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:

(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;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.4 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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 should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.5 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

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 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.6 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to 326 IAC 2-6.1-6(d)(3):

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by a notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.7 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.8 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.9 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.10 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 by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

Testing Requirements

C.11 Performance Testing [326 IAC 3-6] [326 IAC 2-1.1-11]

(a) Compliance testing on new emissions units shall be conducted within sixty (60) days after achieving maximum production rate, but no later than one hundred eighty (180) days after initial start-up, if specified in Section D of this approval. 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
Compliance Data 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 Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ, within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.12 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.13 Maintenance of Monitoring Equipment [IC 13-14-1-13]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour this time frame is determined on a case by case basis until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Monitoring Methods [326 IAC 3]

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, or other approved methods as specified in this permit.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 1-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

(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 corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(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. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.17 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a) (1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.18 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down

or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-6.1-2]

(a) Records of all required monitoring data and support information 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 kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by

Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.20 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) The reports required by conditions in Section D of this permit shall be submitted to:

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

(b) 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.

(c) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.21 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

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

(d) The notification 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.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: metal fluid pump manufacturing

(a) Four (4) spray paint booths, known as B-1 through B-4, equipped with five (5) airless spray guns, known as A-1 through A-4, and A-6, and dry filters to control overspray, exhausting through Stacks B-1 through B-4, capacity: 150 pumps per hour, total.

(b) One (1) natural gas-fired waste water evaporator, known as EV-1, exhausting to Stack EV-1, heat input capacity: 0.353 million British thermal units per hour.

(c) One (1) natural gas-fired roof top heater, known as RTU-1, constructed in 1996, heat input capacity: 0.180 million British thermal units per hour.

(d) One (1) natural gas-fired roof top heater, known as RTU-2, constructed in 1996, heat input capacity: 0.080 million British thermal units per hour.

(e) Four (4) natural gas-fired roof top heaters, known as RTU-3 through RTU-6, constructed in 1996, heat input capacity: 0.250 million British thermal units per hour, each.

(f) One (1) natural gas-fired roof top heater, known as RTU-7, constructed in 1996, heat input capacity: 0.150 million British thermal units per hour.

(g) Three (3) natural gas-fired roof top heaters, known as RTU-8 through RTU-10, heat input capacity: 0.180 million British thermal units, each.

(h) Two (2) natural gas-fired air make up units, known as AMU-1 and AMU-2, constructed in 1996, heat input capacity: 8.25 million British thermal units per hour, each.

(i) One (1) self-contained dehydrator, known as D-1, capacity: 10 pounds of moisture removal per hour (no emissions).

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

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the four (4) spray booths, known as B-1 through B-4, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance 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.

D.1.2 Particulate [326 IAC 6-3-2(d)]

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

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

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

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for these emission units and any control devices.

D.1.4 Nonapplicability

(a) The requirement from CP 003-5029-00238, issued on February 21, 1996, Operation Condition 3 that the input of the surface coatings and solvents to the metal pump coating operations shall be limited such that the production is equivalent to a fixed monthly VOC total of 20.75 tons per month has not been included in this MSOP. The unrestricted potential to emit of VOC is now less than 250 tons per year rendering the requirements of 326 IAC 2-2 and 40 CFR 52.21 not applicable without a limit. Thus, Operation Condition 3 of CP 003-5029-00238 is hereby rescinded.

(b) The requirement from CP 003-5029-00238, issued on February 21, 1996, Operation Condition 4 that pursuant to 326 IAC 2-6 (Emission Reporting), the owner/operator of Tuthill Corporation, Fill-Rite Division must annually submit an emission statement for the facility. This statement which was required to be received by July 1 of each year has not been included in this MSOP. Emission reporting is no longer required for this source because the potential to emit VOC, PM, PM_{10}, CO, NO_X, and SO_2 are now less than one hundred (100) tons per year. Thus, Operation Condition 4 of CP 003-5029-00238 is hereby rescinded.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

There are no specific Compliance Monitoring Requirements applicable to these emission units.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.6 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.1.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The total VOC usage for each month.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with Condition D.1.2.

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

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES ?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____
PHONE NO. :_____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20_____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM / PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____
_____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

*** Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Tuthill Corporation, Fill-Rite Division**
Address:	**8825 Aviation Drive**
City:	**Fort Wayne, Indiana 46809**
Phone #:	**260-747-7529**
MSOP #:	**003-15783-00238**

I hereby certify that Tuthill Corporation, Fill-Rite Division is
still in operation.
no longer in operation.

I hereby certify that Tuthill Corporation, Fill-Rite Division is
in compliance with the requirements of MSOP **003-15783-00238**.
not in compliance with the requirements of MSOP **003-15783-00238**.

Authorized Individual (typed):	**Russ Deter**
Title:	
Signature:	
Date:	

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Permit Revision to a Minor Source Operating Permit

Source Background and Description

Source Name:	**Tuthill Corporation, Fill-Rite Division**
Source Location:	**8825 Aviation Drive, Fort Wayne, Indiana 46809**
County:	**Allen**
SIC Code:	**3561**
Operation Permit No.:	**MSOP 003-15783-00238**
Operation Permit Issuance Date:	**July 29, 2002**
Minor Permit Revision No.:	**MPR 003-22518-00238**
Permit Reviewer:	**Brian J. Pedersen**

The Office of Air Quality (OAQ) has reviewed a revision application from Tuthill Corporation, Fill-Rite Division relating to the operation and increased capacity of the following existing emission units and pollution control devices:

> Four (4) spray paint booths, identified as B-1 through B-4, equipped with five (5) airless spray guns, known as A-1 through A-4, and A-6, and dry filters to control overspray, exhausting through Stacks B-1 through B-4, capacity: 150 pumps per hour, total.

History

A written request was received by the Office of Air Quality on October 11, 2005 to add an additional airless spray gun to their existing booth, identified as B-1. The addition of this gun will provide the ability to apply a “dust coat” or tack–coat of paint to the pump prior to proceeding to the finished product.

On January 17, 2006, Tuthill Corporation, Fill-Rite Division submitted an application to the Office of Air Quality requesting to increase the overall source capacity for the existing four (4) spray paint booths, identified as B-1 through B-4. The source wide capacity shall increase from one hundred (100) pumps per hour to one hundred fifty (150) pumps per hour. The addition of the airless spray gun and the increased source capacity shall be addressed in this Minor Permit Revision 003-22518-00238.

The spray booth, identified as B-5, shall be removed from Condition A.2 and Section D.1 because Tuthill Corporation, Fill-Rite Division failed to construct or apply for an extension for the booth within the eighteen (18) months, by September 12, 2005, of the issuance of MPR 003-18452-00238. This removal of the spray booth, identified as B-5, shall not affect the emissions of the source.

Tuthill Corporation, Fill-Rite Division was issued a Minor Source Operating Permit (MSOP) on July 29, 2002.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the MSOP Minor Permit Revision 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 January 17, 2006. Additional information was received on February 6 and February 7, 2006.

Emission Calculations

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

Potential To Emit of Revision

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."

This table reflects the PTE before controls for this revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	**Potential To Emit** (tons/year)
PM	17.3
PM_{10}	17.3
SO_2	-
VOC	4.41
CO	-
NO_X	-

HAPs	**Potential To Emit** (tons/year)
Glycol Ethers	3.10
TOTAL	3.10

Justification for Revision

The MSOP is being revised through a MSOP Minor Permit Revision. This revision is being performed pursuant to 326 IAC 2-6.1-6(g), because the potential to emit of PM and PM_{10} are each greater than five (5) tons per year but less than twenty-five (25) tons per year.

County Attainment Status

The source is located in Allen County.

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

(a) Volatile organic compounds (VOC) and nitrogen oxides (NO_X) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements of 326 IAC 2-3, Emission Offset. See the State Rule Applicability - Entire Source section of this document.

(b) Allen County has been classified as unclassifiable or attainment for $PM_{2.5}$. 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 $PM_{2.5}$ emissions, it has directed states to regulate PM_{10} emissions as a surrogate for $PM_{2.5}$ emissions. See the State Rule Applicability - Entire Source section of this document.

(c) Allen County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.

(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

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

Pollutant	**Emissions** (tons/year)
PM	0.348
PM_{10}	0.354
SO_2	0.050
VOC	9.35
CO	6.92
NO_X	8.24

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

(b) These emissions are based upon Technical Support Documents (TSD) for MSOP 003-15783-00238 and Minor Revision 003-18452-00238.

Potential to Emit of Revision After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units.

	Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Proposed Revision	17.3	17.3	-	4.41	-	-	3.10
Existing Source	34.8	35.3	0.500	9.35	6.92	8.24	6.35
Total	52.1	52.6	0.500	13.8	6.92	8.24	9.45
MSOP Threshold Level	100	100	100	100	100	100	10/25

This revision to the existing MSOP will **not** change the status of the stationary source because the potential emissions from the entire source will still be less than the Part 70 major source thresholds.

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 proposed revision.

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

State Rule Applicability - Individual Facilities

326 IAC 2-3 (Emission Offset)

The unrestricted potential VOC emissions and the unrestricted potential NO_X emissions, from the entire source, are each less than one-hundred (100) tons per year after this revision. Therefore, this source is a minor source pursuant to 326 IAC 2-3, Emission Offset.

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

The potential to emit of all remaining criteria pollutants, from the entire source, which is not one (1) of the twenty-eight (28) major source categories, after this revision, is less than two-hundred fifty (250) tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) are not applicable.

326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies)

(a) Pursuant to 326 IAC 6-3-2(d), the dry particulate filers for particulate control shall be operation in accordance with manufacturer's specifications and control emissions from the four (4) spray booths, identified as B-1 through B-4, at all times when these spray booths are in operation.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

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

(c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the four (4) spray booths, identified as B-1 through B-4, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance 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 booths are in compliance with this requirement.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

Change 1:

The source has added an airless spray gun to their existing booth, identified as B-1. The source wide capacity of the four (4) spray booths, identified as B-1 through B-4, shall increase from one hundred (100) pumps per hour to one hundred fifty (150) pumps per hour. The spray booth, identified as B-5, shall be removed from Sections A.2 and D.1 because Tuthill Corporation, Fill-Rite Division failed to construct or apply for an extension for the booth within the eighteen (18) months, by September 12, 2005, of the issuance of MPR 003-18452-00238. Condition A.2 and Section D.1 have been amended as follows:

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) Four (4) spray paint booths, known as B-1 through B-4, equipped with ~~four (4)~~ **five (5)** airless spray guns, known as A-1 through A-4, **and A-6,** and dry filters to control over-spray, exhausting through Stacks B-1 through B-4, capacity: **150** ~~100~~ pumps per hour, total.

(b) One (1) natural gas-fired waste water evaporator, known as EV-1, exhausting to Stack EV-1, heat input capacity: 0.353 million British thermal units per hour.

(c) One (1) natural gas-fired roof top heater, known as RTU-1, constructed in 1996, heat input capacity: 0.180 million British thermal units per hour.

(d) One (1) natural gas-fired roof top heater, known as RTU-2, constructed in 1996, heat input capacity: 0.080 million British thermal units per hour.

(e) Four (4) natural gas-fired roof top heaters, known as RTU-3 through RTU-6, constructed in 1996, heat input capacity: 0.250 million British thermal units per hour, each.

(f) One (1) natural gas-fired roof top heater, known as RTU-7, constructed in 1996, heat input capacity: 0.150 million British thermal units per hour.

(g) Three (3) natural gas-fired roof top heaters, known as RTU-8 through RTU-10, heat input capacity: 0.180 million British thermal units, each.

(h) Two (2) natural gas-fired air make up units, known as AMU-1 and AMU-2, constructed in 1996, heat input capacity: 8.25 million British thermal units per hour, each.

(i) One (1) self-contained dehydrator, known as D-1, capacity: 10 pounds of moisture removal per hour (no emissions).

~~(j) One (1) spray paint booth, known as B-5, equipped with one (1) airless spray gun, known as A-5, and dry filters to control PM overspray, exhausting through Stacks B-5, capacity: 25 pumps per hour.~~

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: metal fluid pump manufacturing

(a) Four (4) spray paint booths, known as B-1 through B-4, equipped with ~~four (4)~~ **five (5)** airless spray guns, known as A-1 through A-4, **and A-6,** and dry filters to control overspray, exhausting through Stacks B-1 through B-4, capacity: **150** ~~100~~ pumps per hour, total.

(b) One (1) natural gas-fired waste water evaporator, known as EV-1, exhausting to Stack EV-1, heat input capacity: 0.353 million British thermal units per hour.

(c) One (1) natural gas-fired roof top heater, known as RTU-1, constructed in 1996, heat input capacity: 0.180 million British thermal units per hour.

(d) One (1) natural gas-fired roof top heater, known as RTU-2, constructed in 1996, heat input capacity: 0.080 million British thermal units per hour.

(e) Four (4) natural gas-fired roof top heaters, known as RTU-3 through RTU-6, constructed in 1996, heat input capacity: 0.250 million British thermal units per hour, each.

(f) One (1) natural gas-fired roof top heater, known as RTU-7, constructed in 1996, heat input capacity: 0.150 million British thermal units per hour.

(g) Three (3) natural gas-fired roof top heaters, known as RTU-8 through RTU-10, heat input capacity: 0.180 million British thermal units, each.

(h) Two (2) natural gas-fired air make up units, known as AMU-1 and AMU-2, constructed in 1996, heat input capacity: 8.25 million British thermal units per hour, each.

(i) One (1) self-contained dehydrator, known as D-1, capacity: 10 pounds of moisture removal per hour (no emissions).

~~(j) One (1) spray paint booth, known as B-5, equipped with one (1) airless spray gun, known as A-5, and dry filters to control PM overspray, exhausting through Stacks B-5, capacity: 25 pumps per hour.~~

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

Change 2:

The requirements of PM Overspray [326 IAC 6-3-2(d)(2)] in Condition D.1.6 shall be removed from the Compliance Determination Requirements and combined with Condition D.1.2 Particulate [326 IAC 6-3-2(d)(1)] in Emission Limitations and Standards. The Record Keeping Requirements in Condition D.1.7 (b) shall be amended to reflect the current language, as well. Condition D.1.7 has been renumbered to Condition D.1.6 accordingly.

D.1.2 Particulate [326 IAC 6-3-2(d)~~(1)~~]

(a) Pursuant to 326 IAC 6-3-2(d)~~(1),~~ **the particulate from** the surface coating shall be controlled by a dry particulate filter, waterwash or an equivalent control device, and the control device shall be operated in accordance with manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

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

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

~~D.1.6 PM Overspray [326 IAC 6-3-2(d)(2)]~~

~~Pursuant to 326 IAC 6-3-2(d)(2), if overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the dry filters and do either of the following no later than four (4) hours after such observation:~~

~~(a) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.~~

~~(b) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.~~

D.1.**6**~~7~~ Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.1.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The total VOC usage for each month.

(b) ~~To document compliance with Condition D.1.6, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the dry filters, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground.~~ **To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with Condition D.1.2.**

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

Change 3:

Allen County has been designated as nonattaiment for 8-hour ozone. Condition A.1 has been amended as follows:

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary metal fluid pump coating source.

Authorized Individual:	Russ Deter
Source Address:	8825 Aviation Drive, Fort Wayne, Indiana 46809
Mailing Address:	8825 Aviation Drive, Fort Wayne, Indiana 46809
Phone Number:	260-747-7529
SIC Code:	3561
County Location:	Allen County
County Status:	**Nonattainment for 8-hour ozone** Attainment for all **remaining** criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act

Conclusion

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Minor Permit Revision No. 003-22518-00238.

Appendix A: Emissions Calculations
VOC , Particulate and HAPs
From Surface Coating Operations

Company Name: Tuthill Corporation, Fill-Rite Division
Address City IN Zip: 8825 Aviation Drive, Fort Wayne, Indiana 46809
MSOP: 003-22518
Plt ID: 003-00238
Reviewer: Brian J. Pedersen
Date: January 17, 2006

(Existing Source, After Revision)

VOC and PM Emissions

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/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 (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Booths B-1,2,3, and 4																
Black	8.54	64.35%	55.6%	8.7%	56.5%	31.00%	0.023	150	1.72	0.75	2.58	61.87	11.29	41.4	2.41	10%
Red	8.78	61.75%	51.7%	10.0%	53.8%	38.00%	0.023	150	1.91	0.88	3.04	72.95	13.31	45.7	2.32	10%
Yellow	9.00	57.60%	49.8%	7.8%	53.9%	36.00%	0.023	150	1.52	0.70	2.42	58.13	10.61	51.9	1.95	10%
Clean up																
Isopropyl Alcohol	6.60	100.00%	0.0%	100.0%	0.0%	0.00%	0.000004	150	6.60	6.60	0.003	0.083	0.015	0.00	N/A	10%
								PM	Control Efficiency	99.00%						
State Potential Emissions			**Add worst case coating to all solvents**						**Uncontrolled**	**Worst Case**	**3.04**	**73.0**	**13.3**	**51.9**		
									Controlled	**Worst Case**	**3.04**	**73.0**	**13.3**	**0.519**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/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

Haps Emissions

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ether	Glycol Ether Emissions (tons/yr)
Booths B-1,2,3, and 4					
Black	8.54	0.023	150	6.00%	7.74
Red	8.78	0.023	150	7.00%	9.29
Yellow	9.00	0.023	150	5.00%	6.80
			Individual Total	**Worst Case**	**9.29**
			Overall Total	**Worst Case**	**9.29**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC , Particulate and HAPs
From Surface Coating Operations

Company Name: Tuthill Corporation, Fill-Rite Division
Address City IN Zip: 8825 Aviation Drive, Fort Wayne, Indiana 46809
MSOP: 003-22518
Plt ID: 003-00238
Reviewer: Brian J. Pedersen
Date: January 17, 2006

(Existing Source, Before Revision)

VOC and PM Emissions

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/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 (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Booths B-1,2,3, and 4																
Black	8.54	64.35%	55.6%	8.7%	56.5%	31.0%	0.023	100	1.72	0.75	1.72	41.25	7.53	27.6	2.41	10%
Red	8.78	61.75%	51.7%	10.0%	53.8%	38.0%	0.023	100	1.91	0.88	2.03	48.64	8.88	30.4	2.32	10%
Yellow	9.00	57.60%	49.8%	7.8%	53.9%	36.0%	0.023	100	1.52	0.70	1.61	38.75	7.07	34.6	1.95	10%
Booth B-5																
Red	8.78	61.75%	51.7%	10.0%	53.8%	38.0%	0.023	25	1.91	0.88	0.51	12.16	2.22	7.6	2.32	10%
Clean up																
Isopropyl Alcohol	6.60	100.00%	0.0%	100.0%	0.0%	0.00%	0.000004	100	6.60	6.60	0.002	0.055	0.010	0.00	N/A	10%
								PM	Control Efficiency	99.00%						

State Potential Emissions	**Add worst case coating to all solvents**	**Uncontrolled**	**Worst Case**	**2.03**	**48.7**	**8.89**	**34.6**
		Controlled	**Worst Case**	**2.03**	**48.7**	**8.89**	**0.346**

METHODOLOGY
Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/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

Haps Emissions

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ether	Glycol Ether Emissions (tons/yr)
Booths B-1,2,3, and 4					
Black	8.54	0.023	100	6.00%	5.16
Red	8.78	0.023	100	7.00%	6.19
Yellow	9.00	0.023	100	5.00%	4.53
Booth B-5					
Red	8.78	0.023	25	5.00%	1.11
			Individual Total	**Worst Case**	**6.19**
			Overall Total	**Worst Case**	**6.19**

METHODOLOGY
HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs