

TO: Interested Parties / Applicant

RE: MSW / 097-22668-00509

FROM: Felicia A. Robinson  
Manager of Environmental Planning  
City of Indianapolis  
Office of Environmental Services

## 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 Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



April 17, 2006

Mr. Keith Kenipe  
MSW  
P.O. Box 279  
Noblesville, IN 46061-0279

CERTIFIED MAIL 7000 0600 0023 5187 1523

RE: Exempt Construction and Operation  
Status  
097-22668-00509

Dear Mr. Kenipe:

The application from MSW, received on February 1, 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 auto transmission repair and restoration plant, located at 8258 Zionsville Road, Indianapolis, Indiana 46268, is classified as exempt from air pollution permit requirements.

The source consists of the following process/equipment:

- (a) Welding operations, using copper-based wire and nickel-based wire, with maximum capacity of 498 tons per year.
- (b) Natural gas combustion equipment (space heaters), with total maximum heat input capacity of 6,100 Btu/hr.
- (c) Aqueous parts washing operation consisting of two (2) wash tanks with 1,180 gallons and 590 gallons capacity, and one (1) rinse tank with 600 gallons capacity. In washing tanks ES-9600 5% solution will be used, containing no VOC or HAPs; in rinsing tanks a 1-2% water solution of rust inhibitor ES-5601LF will be used; ES-5601LF contains less than 8% by weight of VOC (glycol ethers).
- (d) 275-gallon above ground storage tank for storing used oil.
- (e) Three (3) abrasive blasting machines with built-in dust collectors and air flow, respectively, 1000, 1000, and 780 actual cubic feet per minute. Manufacturer guaranteed PM emission rate is no more than 0.01 grain per dry standard cubic foot.
- (f) One (1) abrasive blasting machine with built-in dust collector and air flow of 2000 actual cubic feet per minute. Manufacturer guaranteed PM emission rate is no more than 0.03 grain per dry standard cubic foot.

The following conditions shall be applicable:

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



Air Quality Hotline: 317-327-4AIR | [knozone.com](http://knozone.com)

Department of Public Works  
Office of Environmental Services

2700 Belmont Avenue  
Indianapolis, IN 46221

317-327-2234  
Fax 327-2274  
TDD 327-5186  
[indygov.org/dpw](http://indygov.org/dpw)

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- (2) Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), the particulate from welding operation shall not exceed the pound per hour emission rate established as E in the following formula:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;  
and  
P = process weight rate in tons per hour

The combined process weight rate for the welding operation is 498 ton/yr of wire, or 0.0568 ton/hr. Therefore, pursuant to 326 IAC 6-3-2(e), the allowable emissions rate for the welding operation is 0.600 pounds per hour.

- (3) Pursuant to 326 IAC 8-3-1(b)(1)(A), this new Aqueous Parts Washing Operation is subject to requirements of 326 IAC 8-3-5 (Cold cleaner degreaser operation and control). The owner or operator of a cold cleaning facility shall:
- (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (1) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
    - (2) the solvent is agitated; or
    - (3) the solvent is heated.
  - (b) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (c) Equip the degreaser with a freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater, if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)).
  - (d) Provide a permanent, conspicuous label which lists the operating requirements outlined below.
  - (e) The owner or operator of a cold cleaning facility shall ensure that the following

operating requirements are met:

- (1) Close the cover whenever articles are not being handled in the degreaser.
- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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

An application or notification shall be submitted in accordance with 326 IAC 2 to the Indianapolis Office of Environmental Services (OES) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions, please feel free to contact Monica Doyle at 317-327-2846.

Sincerely,

ORIGINAL SIGNED BY

Felicia A. Robinson  
Manager of Environmental Planning  
Office of Environmental Services

FAR/mmd

cc: File  
Air Compliance – Matt Mosier  
IDEM, OAQ – Mindy Hahn  
Marion County Health Department

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
and  
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

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

**Source Background and Description**

Source Name:	MSW
Source Location:	8258 Zionsville Road, Indianapolis, IN 46268
County:	Marion
SIC Code:	3714 (Motor Vehicle Parts and Accessories)
Exemption No.:	097-18103-00509
Exemption Issuance Date:	October 7, 2003
Exemption Revision No.:	097-22668-00509
Permit Reviewer:	Monica Doyle

The Office of Environmental Services (OES) has reviewed an application from MSW relating to the operation of a stationary auto transmission repair and restoration plant.

**History and Background**

On October 7, 2003, an Exemption was issued for MSW, a stationary auto transmission repair and restoration plant located at 8258 Zionsville Road, Indianapolis, Indiana 46268.

On February 1, 2006, OES received a letter from the source requesting that an additional abrasive blasting machine be added to the list of units onsite at this Exemption level source.

**Emission Units and Pollution**

The source consists of the following emission units:

- (a) Welding operations, using copper-based wire and nickel-based wire, with maximum capacity of 498 tons per year.
- (b) Natural gas combustion equipment (space heaters), with total maximum heat input capacity of 6,100 Btu/hr.
- (c) Aqueous parts washing operation consisting of two (2) wash tanks with 1,180 gallons and 590 gallons capacity, and one (1) rinse tank with 600 gallons capacity. In washing tanks ES-9600 5% solution will be used, containing no VOC or HAPs; in rinsing tanks a 1-2% water solution of rust inhibitor ES-5601LF will be used; ES-5601LF contains less than 8% by weight of VOC (glycol ethers).
- (d) 275-gallon above ground storage tank for storing used oil.
- (e) Three (3) abrasive blasting machines with built-in dust collectors and air flow, respectively, 1000, 1000, and 780 actual cubic feet per minute. Manufacturer guaranteed PM emission rate of no more than 0.01 grain per dry standard cubic foot.

- (f) One (1) abrasive blasting machine with built-in dust collector and air flow of 2000 actual cubic feet per minute. Manufacturer guaranteed PM emission rate of no more than 0.03 grain per dry standard cubic foot.

### Existing Approvals

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

- (a) Exemption 097-18108-00509, issued on October 7, 2003.

All conditions from previous approvals were incorporated into this permit.

### Justification for the Revision

The Exemption for this source is being modified and issued pursuant to 326 IAC 2-1.1-3.

### Enforcement Issues

There are no enforcement actions pending. Pursuant to 326 IAC 2.1-1-2, this source is exempt from permitting requirements.

### Recommendation

The staff recommends to the Administrator that an exemption from air pollution permit requirements be approved. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, information used in this review was derived from the source's letter received on February 1, 2006.

### Emissions Calculations

See Appendix A for detailed emission calculations (Appendix A, pages 1 and 2).

### Potential To Emit

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

Pollutant	Potential To Emit (tons/year)
PM	1.909
PM-10	1.909
SO <sub>2</sub>	0.000
VOC	0.425
CO	0.0022
NO <sub>x</sub>	0.0027

HAPs	Potential To Emit (tons/year)
Metal (Nickel)	0.766
Glycol Ethers	0.361
TOTAL	1.127

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16) of all 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. An exemption will be issued.

**County Attainment Status**

The source is located in Marion County.

Pollutant	Status
PM-2.5	non-attainment
PM-10	attainment
SO <sub>2</sub>	maintenance attainment
NO <sub>2</sub>	attainment
8-hour Ozone	basic nonattainment
1-hour Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions, pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.
- (c) Marion County has been classified as attainment or unclassifiable in Indiana for PM10, SO<sub>2</sub>, NO<sub>2</sub>, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) Fugitive Emissions  
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### 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	Potential To Emit (tons/year)
PM	1.909
PM-10	1.909
SO <sub>2</sub>	0.000
VOC	0.425
CO	0.0022
NO <sub>x</sub>	0.0027
<b>HAPs</b>	
Metal (Nickel)	0.766
Glycol Ethers	0.361
TOTAL	1.127

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater, no non-attainment regulated pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories.

### Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 097-22668-00509, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This status is based on all the air approvals issued to the source. This status has been verified by the OES inspector assigned to the source.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards 40 CFR Part 60 or NESHAP 40 CFR Part 63 applicable to this source.  
(b) NESHAP 40 CFR Part 63, Subpart T (National Emission Standards for halogenated Solvent Cleaning) is not applicable because no halogenated HAP solvents (as defined in 40 CFR Part 63, §63.460(a)), are used in the aqueous parts washing operation.

### State Rule Applicability

326 IAC 5-1 (Opacity Limitations)

This source is located in Marion County. Therefore, 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

326 IAC 2-1.1-3 (Exemptions)

- (a) Pursuant to 326 IAC 2-1.1-3(e)(10)(E)(iv), the welding operation using copper-based wire (no HAPs emissions) is exempt from air permit requirements.
- (b) Pursuant to 326 IAC 2-1.1-3(e)(1)(H), the welding operation using nickel-based wire is exempt from air permit requirements because HAP (nickel) emission is less than 1 ton per year.
- (c) Pursuant to 326 IAC 2-1.1-3(e)(5)(A)(i), natural gas combustion equipment is exempt from air permit requirements because its total heat input capacity is less than 10,000,000 Btu/hr.
- (d) Aqueous parts washing operation uses aqueous solutions containing less than 1% by weight of VOC, and HAP (glycol ethers) emissions is less than 1 (one) ton per year; therefore, pursuant to 326 IAC 2-1.1-3(e)(13)(D) and 326 IAC 2-1.1-3(e)(1)(H), aqueous parts washing operation is exempt from air permit requirements.
- (e) Pursuant to 326 IAC 2-1.1-3(e)(7)(B), the 275-gallon above ground storage tank is exempt from air permit requirements as a vessel storing lubricating/machining oils.
- (f) Pursuant to 326 IAC 2-1.1-3(e)(26)(D), three (3) abrasive blasting machines with design grain loading of less than or equal to three-hundredths (0.03) grain per actual cubic foot and air flow rates less than 4,000 actual cubic feet per minute are exempt from air permit requirements.

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

Pursuant to 326 IAC 6-3-2(e), the PM emissions from welding operation shall not exceed the pound per hour emission rate established as E in the following formula:

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

The combined process weight rate for the welding operation is 498 ton/yr of wire, or 0.0568 ton/hr. Therefore, pursuant to 326 IAC 6-3-2(e), the allowable emissions rate for the welding operation is 0.600 pounds per hour. Potential PM emission is 0.227 lb/hr. Therefore, this source will be in compliance with this rule.

Pursuant to 326 IAC 6-3-1(b)(14), the abrasive blasting machines are not subject to this rule because their PM potential emissions are less than five hundred fifty-one thousandths (0.551) pound per hour.

### 326 IAC 8-3 (Organic Solvent Degreasing Operations)

Pursuant to 326 IAC 8-3-1(b)(1)(A), this new Aqueous Parts Washing Operation is subject to requirements of 326 IAC 8-3-5 (Cold cleaner degreaser operation and control). The owner or operator of a cold cleaning facility shall:

- (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (1) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (2) the solvent is agitated; or
  - (3) the solvent is heated.
- (b) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (c) Equip the degreaser with a freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater, if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)).
- (d) Provide a permanent, conspicuous label which lists the operating requirements outlined below.
- (e) The owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

### Conclusion

The operation of this auto transmission repair and restoration plant shall be subject to the conditions of this Exemption No.: 097-22668-00509.



Appendix A: Emissions Calculations							TSD App A. Page 2 of 2
Company Name:	MSW						
Address City IN Zip:	8258 Zionsville Road, Indianapolis, IN 46268						
Exemption:	097-22668-00509						
Reviewer:	Monica Doyle						
<b>Aqueous parts washing</b>							
Tank 1 (5% ES5601LF)	1180	gallons					
Tank 2 (5% ES5601LF)	590	gallons					
Tank 3 (ES9600, no VOC)	600	gallons					
Tanks are dumped every 30-60 days.							
ES9600 contains no VOCs							
Tank 3 contains 1-2% of ES9600							
ES5601LF contains less than 8% VOC (glycol ethers)							
Tanks 1 and 2 contain 5% of ES5601LF (VOC content less than 0.4%)							
<b>Tanks 1 and 2 (totals)</b>							
Gallons	Gallons	Lbs	Lbs VOC	Lbs VOC	Lbs VOC	Tons VOC	
water	additive	additive		per year	per day	per year	
1770	88.5	752.9	60.23	722.7	1.980	0.361	
<b>Welding Operations</b>							
Maximum number of parts per 8 hour shift							
	42	parts					
Time spent welding each part							
	11.43	minutes/part					
Maximum welding wire usage							
	52	inches/minute					
Maximum weight of wire per inch							
	0.583	oz/inch					
Maximum application rate per part							
	21.66	pounds per part					
Maximum usage per year							
	498.0	tons/year	2,729	lb/day (365 day/yr)			
Actual usage per year							
	118.2	tons/year	648	lb/day (365 day/yr)			