

TO: Interested Parties / Applicant

RE: Sterling Fluid Systems (USA), LLC – Peerless Pump / 097-22699-00579

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

March 23, 2006



Mr. Mike Garland  
Sterling Fluid Systems (USA), LLC – Peerless Pump  
2005 Dr. Martin Luther King Jr. Street  
Indianapolis, Indiana 46202

Certified Mail: 7000 0600 0023 5186 5881

Re: Exempt Construction and Operation Status,  
097-22699-00579

Dear Mr. Garland:

The application from Sterling Fluid Systems (USA), LLC – Peerless Pump, received on February 14, 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 pump surface coating operation, located at 2005 Martin Luther King Jr. Street, Indianapolis, Indiana, is classified as exempt from air pollution permit requirements:

- (a) One (1) airless paint spray booth #1 for painting custom made pumps, installed in 1996, with a maximum capacity of 3.125 pumps per hour, with an arrestor bank filter for particulate matter overspray control, exhausting through two (2) stacks (Stack IDs 1 and 2).

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, 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.
- (2) Any change or modification that will cause VOC emissions to exceed 15 pounds per day from the airless paint spray booth shall require prior approval from IDEM, OAQ and OES before such change or modification shall occur.
- (3) To document compliance with condition (2), the Permittee shall maintain records in accordance with (a) through (c) below.
  - (a) The amount of coating material and solvent used on daily basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.



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)

- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (b) The daily cleanup solvent usage; and
- (c) The total VOC usage for each day.

An application or notification shall be submitted in accordance with 326 IAC 2 to the City of Indianapolis Office of Environmental Services (OES) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

ORIGINAL SIGNED BY

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

TE/EVP

cc: File  
Air Compliance – Jennifer Schick  
Permits – Anh-tuan Nguyen  
IDEM – Mindy Hahn

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
City of Indianapolis  
Office of Environmental Services**

Technical Support Document (TSD) for an Exemption

**Source Background and Description**

<b>Source Name:</b>	<b>Sterling Fluid Systems (USA), LLC – Peerless Pump</b>
<b>Source Location:</b>	<b>2005 Martin Luther King Jr. Street Indianapolis, IN 46202</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>3561</b>
<b>Exemption No.:</b>	<b>097-22699-00579</b>
<b>Permit Reviewer:</b>	<b>Trish Earls/EVP</b>

The Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) has reviewed an application from Sterling Fluid Systems (USA), LLC – Peerless Pump relating to the operation of a pump surface coating operation.

**Unpermitted Emission Units and Pollution Control Equipment**

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

- (a) One (1) airless paint spray booth #1 for painting custom made pumps, installed in 1996, with a maximum capacity of 3.125 pumps per hour, with an arrestor bank filter for particulate matter overspray control, exhausting through two (2) stacks (Stack IDs 1 and 2).

**Existing Approvals**

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

- (a) CP 965384-01 issued on October 9, 1996.

All conditions from previous approvals were incorporated into this permit except the following:

- (a) All construction conditions from all previously issued permits.

Reason not incorporated: This source is no longer subject to the construction permit requirements under 326 IAC 2 because the potential to emit (as defined in 326 IAC 2-7-1(29)) of all pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1), Exemptions. Therefore, the construction conditions are no longer applicable.

**Enforcement Issue**

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
1	Paint Booth #1	42	2.83	12,000	ambient
2	Paint Booth #1	42	2.83	12,000	ambient

### Recommendation

The staff recommends to the Administrator that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on February 14, 2006.

### Emission Calculations

See Appendix A of this document for detailed emission calculations (Page 1 of 1).

### Potential to Emit of the Source Before Controls

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/yr)
PM	3.04
PM-10	3.04
SO <sub>2</sub>	0.0
VOC	4.57
CO	0.0
NO <sub>x</sub>	0.0

HAPs	Potential to Emit (tons/yr)
Xylene	1.68
Toluene	0.84
Ethylbenzene	0.84
Total	3.36

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all 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.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

- (c) **Fugitive Emissions**  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**County Attainment Status**

The source is located in Marion County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Nonattainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Nonattainment
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 all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

**Source Status**

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

Pollutant	Emissions (tons/yr)
PM	3.04
PM-10	3.04
SO <sub>2</sub>	0.0
VOC	4.57
CO	0.0
NO <sub>x</sub>	0.0
Single HAP	1.68
Combination HAPs	3.36

- (a) This existing source is **not** a major stationary source under 326 IAC 2-2 (PSD) because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) This existing source is **not** a major stationary source under 326 IAC 2-3 (Emission Offset) because no nonattainment 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.
- (c) These emissions were based the application submitted on February 14, 2006.

### **Part 70 Permit Determination**

#### 326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this exemption 097-22699-00579, 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 OAQ inspector assigned to the source.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included for this source.

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

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

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

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

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

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

The paint booth is exempt from this rule pursuant to 326 IAC 6-3-1(b)(15) because it uses less than five (5) gallons of coating per day.

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

The paint spray booth is not subject to this rule because it was constructed after July 1, 1990 and has actual VOC emissions of less than 15 pounds per day. Potential VOC emissions from the worst case coating applied are 1.04 pounds per hour. The spray booth is operated 10 hours per day on an actual basis, therefore, actual VOC emissions are 10.4 pounds per day and this rule does not apply.

**Conclusion**

The operation of this pump surface coating operation shall be subject to the conditions of the Exemption 097-22699-00579.

