City of Indianapolis
DPW
Department of Public Works
Bart Peterson, Mayor

TO: Interested Parties / Applicant

RE: White River Architectural Salvage & Antiques / 097-22719-00582

FROM: Felicia A. Robinson FR
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

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Department of Public Works
Office of Environmental Services
2700 Belmont Avenue
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June 5, 2006

City of Indianapolis
DPW
Department of Public Works
Bart Peterson, Mayor

Mr. Doc G. Keys, Jr.
White River Architectural Salvage & Antiques
1325 West 30th Street
Indianapolis, Indiana 46208

Certified Mail Number: 7000 0600 0023 5186 5645

Dear Mr. Keys:

Re: Exempt Construction and Operation Status
097-22719-00582

The application from White River Architectural Salvage & Antiques, received on March 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 furniture stripping and refinishing operation, located at 1325 West 30th Street, Indianapolis, Indiana, is classified as exempt from air pollution permit requirements:

(a) One (1) low pressure air atomization paint spray gun, used for refinishing wood furniture, with a maximum capacity of refinishing five (5) pieces of furniture per month.

The following conditions shall be applicable:

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

(1) 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.

(2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

(b) Any change or modification that will cause VOC emissions to exceed 15 pounds per day from the low pressure air atomization paint spray gun shall require prior approval from City of Indianapolis Office of Environmental Services (OES) before such change or modification shall occur.

(c) To document compliance with condition (b), the Permittee shall maintain records in accordance with (1) through (3) below.

(1) 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.

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

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(2) The daily cleanup solvent usage; and

(3) The total VOC usage for each day.

(d) Records required by this permit shall be retained for a period of at least five (5) years from the date of measurement or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the OES makes a request for records to the Permittee, the Permittee shall furnish the records to the OES within a reasonable time.

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

An application or notification shall be submitted in accordance with 326 IAC 2 to the OES if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

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

LQ/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

Source Name:	**White River Architectural Salvage and Antiques**
Source Location:	**1325 West 30th Street, Indianapolis, IN 46208**
County:	**Marion**
SIC Code:	**7641**
Exemption No.:	**097-22719-00582**
Permit Reviewer:	**Linda Quigley/EVP**

The Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) has reviewed an application from White River Architectural Salvage and Antiques relating to the operation of a furniture stripping and refinishing operation.

Unpermitted Emission Units and Pollution Control Equipment

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

(a) One (1) low pressure air atomization paint spray gun, used for refinishing wood furniture, with a maximum capacity of refinishing five (5) pieces of furniture per month.

Enforcement Issue

There are no enforcement actions pending.

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 March 1, 2006, with additional information received on April 18, 2006.

Emission Calculations

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

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, inclulding 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	0.02
PM-10	0.02
SO_2	0.0
VOC	0.28
CO	0.0
NO_x	0.0

HAPs	Potential to Emit (tons/yr)
Methylene Chloride	0.44
Total	0.44

(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_2	Attainment
NO_2	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	0.02
PM-10	0.02
SO_2	0.0
VOC	0.28
CO	0.0
NO_x	0.0
Single HAP	0.44
Combination HAPs	0.44

(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 March 1, 2006.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the 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 is the first air approval issued to this source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included 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 8-2-12 (Wood Furniture and Cabinet Coating)

The paint spray operation 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 0.06 pounds per hour. The spray gun is operated no more than 8 hours per day on an actual basis; therefore, actual VOC emissions are 0.48 pounds per day and this rule does not apply.

Conclusion

The operation of this furniture stripping and refinishing operation shall be subject to the conditions of the Exemption 097-22719-00582.

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

Company Name: White River Architectural Salvage & Antiques
Address City IN Zip: 1325 West 30th Street, Indianapolis, IN 46208
Exemption: 097-22719-00582
Plt ID: 097-00582
Reviewer: Linda Quigley/EVP
Date: June 5, 2006

As Applied Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/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 (ton/yr)	lb VOC/gal solids	Transfer Efficiency
C14414 Laquer	6.8	89.00%	0.0%	89.0%	0.0%	0.00%	1.50	0.01	6.04	6.04	0.06	1.52	0.28	0.02	n/a	50%
Methylene Chloride	10.0	96.40%	0.0%	96.4%	0.0%	0.00%	1.50	0.01	9.59	9.59	0.10	2.42	0.44	0.00	n/a	100%
Potential Emissions											**0.06**	**1.52**	**0.28**	**0.02**		

*The maximum capacity of stripping and refinishing is 5 units (pieces of furniture) per month.

METHODOLOGY

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