



TO: Interested Parties / Applicant

RE: ImageMark, Incorporated / Exemption 097-22740-00583

FROM: Felicia A. Robinson
Administrator
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



Air Quality Hotline: 317-327-4AIR | 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



January 23, 2007

Mr. Eric Oxener
President
ImageMark, Incorporated
2610 Fortune Circle East
Indianapolis, Indiana 46241

CERTIFIED MAIL 7000 0600 0023 5186 2682

Dear Mr. Oxener:

Re: Exempt Construction and Operation Status,
097-22740-00583

The application from ImageMark, Incorporated received on January 5, 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 passenger railcar painting operation, located at 1500 South Senate Avenue, Indianapolis, Indiana, 46225 is classified as exempt from air pollution permit requirements:

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

- (a) One (1) passenger railcar painting operation, utilizing a maximum of fifteen (15) gallons of paint coatings per week. The railcar painting operation commenced operation in 2006.
- (b) Spot cleanup utilizing a maximum of five (5) gallons per month of cleanup solvent

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 Exemptions), opacity shall meet the following, unless otherwise stated in the 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) Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), this source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right of way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

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



Air Quality Hotline: 317-327-4AIR | knozone.com

Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

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TDD 327-5186
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An application or notification shall be submitted in accordance with 326 IAC 2 to the IDEM, Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services if ImageMark, Incorporated proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

ORIGINAL SIGNED BY

Felicia A. Robinson
Administrator

MBC

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

**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:	ImageMark, Incorporated
Source Location:	1500 South Senate Avenue, Indianapolis, IN 46225
County:	Marion
SIC Code:	4789
Operation Permit No.:	097-22740-00583
Permit Reviewer:	M. Caraher

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services (OES) have reviewed an application from ImageMark, Incorporated relating to the construction and operation of a passenger railcar painting operation.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

- (a) One (1) passenger railcar painting operation, utilizing a maximum of fifteen (15) gallons of paint coatings per week. The railcar painting operation commenced operation in 2006.
- (b) Spot cleanup utilizing a maximum of five (5) gallons per month of cleanup solvent.

Existing Approvals

The source has not been operating under any previous or existing approvals.

Enforcement Issue

- (a) IDEM, OAQ, and OES are aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM, OAQ, and OES are reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Stack Summary

There are no exhaust stacks.

Recommendation

The staff recommends to the Administrator that the construction and 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.

An application for the purposes of this review was received on January 5, 2006, with additional information received on April 18, 2006, January 18th, 2007, and January 19, 2007.

Emission Calculations

See Appendix A (pages 1 through 4) of this document for detailed emission calculations.

Potential to Emit 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	1.53
PM10	1.53
SO ₂	0.0
VOC	2.55
CO	0.0
NO _x	0.0

HAPs	Potential to Emit (tons/yr)
Xylene	2.37
Total	2.37

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated air 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
PM10	Unclassifiable
PM2.5	Nonattainment
SO ₂	Maintenance attainment
NO _x	Attainment
8-hour Ozone	Basic nonattainment
CO	Attainment
Lead	unclassifiable

- (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. Marion County has been designated as nonattainment of the 8-hour ozone standard. Therefore, VOC and NO_x 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 a surrogate for PM2.5 emissions pursuant to the Nonattainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (c) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, PM10, SO₂, Lead and CO emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2.
- (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.
- (e) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	1.53
PM-10	1.53
SO ₂	0.0
VOC	2.55
CO	0.0
NO _x	0.0

Pollutant	Emissions (tons/yr)
Xylene	2.37
Combination HAPs	2.37

- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment 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. Therefore, pursuant to 326 IAC 2-2 and 2-3, the PSD and Emission Offset requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the 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 in this Exemption.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this Exemption.

State Rule Applicability – Entire Source

326 IAC 2-1.1-5 (Air Quality Requirements)

Marion County has been designated as nonattainment for PM2.5. According to an EPA guidance memo dated April 5, 2005, PM-10 is to be utilized as a surrogate for PM2.5 until the EPA can promulgate the PM2.5 implementation rule. PM10 emissions, and therefore PM2.5 emissions, from this source are less than one hundred (100) tons per twelve consecutive month period. There have been no modifications to this source such that it is a major source of PM10 emissions. Therefore, this source is not subject to nonattainment new source review requirements for PM2.5 emissions.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) and 326 IAC 2-3 (Emission Offset)

This existing source is not a major stationary source because no attainment regulated pollutant emissions are equal to or greater than two hundred fifty (250) tons per year, this source is not one of the 28 listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and no attainment or nonattainment regulated pollutant emissions are equal to or greater than one hundred (100) tons per year. There have been no modifications or revisions to this source that were major modifications pursuant to 326 IAC 2-2 or 326 IAC 2-3. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) and 326 IAC 2-3 (Emission Offset) are each not applicable to the source.

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

This existing source commenced operation after July 27, 1997. However, this source does not have the potential to emit any individual single hazardous air pollutant (HAP) equal to or greater

than ten (10) tons per year nor does this source have the potential to emit HAP of equal to or greater than twenty-five (25) tons per year for any combination of HAP. This source did not undergo construction or reconstruction of a major HAP source after July 27, 1997. Therefore, this source is not subject to 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants).

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1(a)(1), (2), and (3), this source is not subject to 326 IAC 2-6 (Emission Reporting) because, as an Exemption, it is not required to have an operating permit under 326 IAC 2-7, it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year, and it is not located in Lake or Porter Counties.

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.

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to the provisions of 326 IAC 6-4 for fugitive dust emissions. 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 6.5-1-2 (Particulate Matter Limitations Except Lake County) and 326 IAC 6.5-6 (Marion County)

This source has the potential to emit particulate of less than one hundred (100) tons per year and has actual emissions less than ten (10) tons per year. ImageMark, Incorporated is not specifically identified in 326 IAC 6.5-6 (Marion County). Therefore, 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County) and 326 IAC 6.5-6 (Marion County) does not apply to this source.

326 IAC 8-1-6 (General Volatile Organic Compound Reduction Requirements)

This source commenced construction and operation after January 1, 1980. Neither the source nor any specific emission unit at this source has the potential to emit twenty five (25) tons per year or more of volatile organic compounds (VOC). Therefore, this source is not subject to 326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities).

State Rule Applicability – Individual Facilities

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

Surface coating manufacturing processes that use less than 5 gallons of coating per day are exempt from the provisions of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes). ImageMark, Incorporated uses a maximum of 15 gallons of coating per week. As a result, the average daily coating usage rate is 3.6 gallons per day (see Appendix A page 2 of 4). Therefore, the passenger railcar painting operation is exempt from the provisions of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

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

ImageMark, Incorporated commenced construction and operation after July 1, 1990. The passenger railcar painting operation, which surface coats miscellaneous metal parts) has the potential to emit VOC of less than fifteen (15) pounds per day (see TSD Appendix A page 2 of 4). Pursuant to 326 IAC 8-2-1(a)(4), miscellaneous metal parts surface coating facilities commencing construction after July 1, 1990 and which have actual VOC emissions of greater than fifteen (15) pounds per day are subject to the provisions of 326 IAC 8-2-9 (Miscellaneous Metal Coating). Since actual VOC emissions are less than fifteen (15) pounds per day, ImageMark, Incorporated is not subject to the provisions of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations).

Conclusion

The construction and operation of this passenger railcar painting operation shall be subject to the conditions of Exemption 097-22740-00583.

Appendix A: Emissions Calculations
Surface Coating - Paint, as supplied / applied

Company Name: ImageMark, Incorporated
Address City IN Zip: 1500 South Senate Avenue, Indianapolis, IN 46225
Permit Number: 097-22740-00583
Plt ID: 097-00583
Reviewer: M. Caraher
Date: 01/18/07

	Coating (as supplied)	Thinner (Dupont 8805)	Coating (as applied - see calculations)
Density	8.3	7.2	8.27
VOC Content (wt %)	42.2	100.0	43.6
Water Content (%)	0.0	0.0	0.0
VOC Content, less water (wt %)	42.2	100.0	43.6
Volatile by volume (%)	48.0	100.0	49.5
Volume % solids	52.0	0.0	50.5
Paint/thinner mix (gallons)	1.0	1/0.03	97.1% / 2.9% as applied

Volatile by volume (%) = lbs VOC/gal coat less water / lbs VOC/gallon VOC

Volume % solids = 1- volatile by volume %

Density of Coating as applied = $8.3(0.971) + 7.2(0.029) = 8.27$ lbs coat/gal coat

VOC Content wt % as applied = $[(8.3)(0.422) + (7.2)(0.29)] / [(8.3) + (7.2)(0.029)] = 0.436$ lb VOC/lb thinned coat
or 43.6%

Volume % solids as applied= $(0.52)/1 + \text{dilution volume} \times 100 = 50.5\%$

Volatile by volume % as applied= $100 - \text{Volume \% solids} = 49.5\%$

Methodology

Coating information and paint/thinner mix ratio supplied by ImageMark, Inc.
Calculations from IDEM, OAQ Form W-4 instructions for surface coating calculations

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

**Company Name: ImageMark, Incorporated
Address City IN Zip: 1500 South Senate Avenue, Indianapolis, IN 46225
Permit Number: 097-22740-00583
Plt ID: 097-00583
Reviewer: M. Caraher
Date: 01/18/07**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & 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
IMRON 3.5 HG-C (as applied)	8.3	43.60%	0.0%	43.6%	0.0%	50.50%	0.15000	1.000	3.61	3.61	0.54	12.98	2.37	1.53	7.14	50%

State Potential Emissions Worst case coating 0.54 12.98 2.37 1.53

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

Operate 5 days/wk and 20 hrs/day; use a maximum of 15 gals coat every week, worst case coating used above
Therefore, coating usage is 15 gal / 100 hours = 0.15 gals/hr; or 0.15 gal/unit & 1.0 units/hr; and 3.6 gal/day (0.15 gals/hr x 24 hr/day = 3.6 gal/day)

Transfer efficiency for HVLP on flat surfaces (railcar interiors) from Air Pollution Engineering Manual (AWMA) 1992

Paint overspray PM10 emissions = PM emissions

**Appendix A: Emission Calculations
Surface Coating HAP Emissions**

Company Name: ImageMark, Incorporated
Address City IN Zip: 1500 South Senate Avenue, Indianapolis, IN 46225
Permit Number: 097-22740-00583
Plt ID: 097-00583
Permit Reviewer: M. Caraher
Date: 01/18/07

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Xylene Emissions (ton/yr)
IMRON 3.5 HG-C (as applied)	8.27	0.1500	1.00	43.60%	2.37

Total State Potential Emissions

2.37

METHODOLOGY

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

**Appendix A: Emission Calculations
Cleanup Solvent Use**

Company Name: ImageMark, Incorporated
Address City IN Zip: 1500 South Senate Avenue, Indianapolis, IN 46225
Permit Number: 097-22740-00583
PIt ID: 097-00583
Permit Reviewer: M. Caraher
Date: 01/18/07

5	gallons of lacquer thinner use per month
6.15	lbs VOC/gal lacquer thinner
30.75	lbs VOC emitted/month
0.18	tons VOC emitted/yr

Notes

lacquer thinner used for cleanup, based on ImageMark
lacquer thinner is non-HAP (aliphatic petroleum naptha)