



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: December 27, 2006
RE: Rotary Lift Company / 077-22872-00011
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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 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 of 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.dot 03/23/06



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

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Indianapolis, Indiana 46204-2251
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(800) 451-6027
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**MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY**

**Rotary Lift
2700 Lanier Drive
Madison, Indiana 47250**

(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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: MSOP 077-22872-00011	
Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: December 27, 2006 Expiration Date: December 27, 2011

TABLE OF CONTENTS

A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]	
A.2	Emission Units and Pollution Control Equipment Summary	
B	GENERAL CONDITIONS	8
B.1	Definitions [326 IAC 2-1.1-1]	
B.2	Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability	
B.5	Severability	
B.6	Property Rights or Exclusive Privilege	
B.7	Duty to Provide Information	
B.8	Certification	
B.9	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.10	Preventive Maintenance Plan [326 IAC 1-6-3]	
B.11	Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.12	Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.13	Permit Renewal [326 IAC 2-6.1-7]	
B.14	Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.15	Source Modification Requirement	
B.16	Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]	
B.17	Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.18	Annual Fee Payment [326 IAC 2-1.1-7]	
B.19	Credible Evidence [326 IAC 1-1-6]	
C	SOURCE OPERATION CONDITIONS.....	13
	Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Permit Revocation [326 IAC 2-1.1-9]	
C.3	Opacity [326 IAC 5-1]	
C.4	Fugitive Dust Emissions [326 IAC 6-4]	
C.5	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-6.1-5(a)(2)]	
C.6	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.7	Compliance Requirements [326 IAC 2-1.1-11]	
	Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]	
C.8	Compliance Monitoring [326 IAC 2-1.1-11]	
C.9	Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]	
C.10	Instrument Specifications [326 IAC 2-1.1-11]	
	Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]	
C.11	Malfunctions Report [326 IAC 1-6-2]	
C.12	General Record Keeping Requirements [326 IAC 2-6.1-5]	
C.13	General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]	

D.1	EMISSIONS UNIT OPERATION CONDITIONS	18
	Emission Limitations and Standards	
D.1.1	Volatile Organic Compounds (VOC) [326 IAC 8-2-9]	
D.1.2	Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]	
D.1.3	Particulate [326 IAC 6-3-2(d)]	
D.1.4	Particulate [326 IAC 6-2-3]	
D.1.5	Particulate Control	
	Compliance Determination Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]	
D.1.6	Volatile Organic Compounds (VOC)	
	Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]	
D.1.7	Record Keeping Requirements	
	Annual Notification	21
	Malfunction Report	22

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 is 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 source that consists of two automotive hydraulic lift manufacturing plants.

Authorized Individual: Harold Hunt, Vice President of Global Operations
Source Address: 2700 Lanier Drive, Madison, Indiana 47250
Mailing Address: P.O. Box 1560, 2700 Lanier Drive, Madison, Indiana 47250
General Source Phone: (812) 273-1622
SIC Code: 3534
County Location: Madison
Source Location Status: Nonattainment for PM2.5
Attainment area for all other criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD and Emission Offset Rules;
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) One (1) Wet Paint Line consisting of one (1) Baking Enamel Paint Booth, identified as EU 1-2, installed in 1985, with a nominal capacity of 5 gallons of paint per hour, using dry filters as particulate control exhausting to two (2) stacks (S/V 1-19 and 1-20).
- (b) One (1) Epoxy Paint Line consisting of one (1) Epoxy Paint Booth, identified as (EU 2-2), installed in 1988, with a nominal capacity of 6 gallons of paint per hour, using dry filters as particulate control, and exhausting to three (3) stacks (S/V 2-9 thru 2-11).
- (c) Three (3) Wash Tanks, each of which is the 1st stage of either a 3 stage washer or a 2 stage washer. The wash tank identified as EU 1-3 installed in 1996 is part of a 3 stage washer, and the wash tanks identified as EU 2-3 installed in 1996 and EU 2-4 installed in 1997, are each part of separate 2 stage washers. The three (3) Wash Tanks (EU 1-3, 2-3 and 2-4) each have a maximum capacity of 2.5 tons steel per hour, and exhaust through stacks S/V 1-4, 2-15, and 2-2, respectively.

Note: The three (3) wash tanks system uses a non-VOC containing solvent (LCP-515), therefore there are no VOC emissions from 2006.
- (d) One (1) Shot Blaster with an integral Baghouse that uses cartridge filters, identified as (EU 1-1), with a nominal capacity of 6,000 pounds of steel and 30 pounds of Steel Shot per hour and exhausts back inside of the building.

- (e) One (1) Shot Blaster with an integral Baghouse that uses cartridge filters, identified as (EU 2-1), with a nominal capacity of 6,000 pounds of steel and 50 pounds of Steel Shot per hour, with dry filter particulate control and exhausting to stack (S/V 2-8).
- (f) One (1) natural gas fired Curing/Drying Oven with a cooling area for the Wet Paint Line, with a maximum capacity of 3.2 MMBTU per hour and exhausting to two (2) stacks (S/V 1-9 and S/V 1-48).
- (g) One (1) natural gas fired Curing/Drying Oven with a cooling area for the Epoxy Paint Line, with a maximum capacity of 4.0 MMBTU per hour and exhausting to two (2) stacks (S/V 2-4 and S/V 2-1).
- (h) One (1) Used Oil Furnace Clean Burn, identified as Model CB-90 AH, with a maximum capacity of 0.185 MMBTU per hour.
- (i) Natural gas heaters with propane back-up with maximum capacities as listed below:
 - (1) One (1) heater with a maximum capacity of 0.06 MMBTU per hour.
 - (2) Two (2) heaters each with a maximum capacity of 0.074 MMBTU per hour.
 - (3) One (1) heater with a maximum capacity of 0.075 MMBTU per hour.
 - (4) Fifteen (15) heaters each with a maximum capacity of 0.080 MMBTU per hour.
 - (5) Two (2) heaters each with a maximum capacity of 0.10 MMBTU per hour.
 - (6) One (1) heater with a maximum capacity of 0.115 MMBTU per hour.
 - (7) One (1) heater with a maximum capacity of 120,000 BTU per hour.
 - (8) Three (3) heaters each with a maximum capacity of 125,000 BTU per hour.
 - (9) Two (2) heaters each with a maximum capacity of 145,000 BTU per hour.
 - (10) Four (4) heaters each with a maximum capacity of 180,000 BTU per hour.
 - (11) Two (2) heaters each with a maximum capacity of 205,000 BTU per hour.
 - (12) One (1) heater with a maximum capacity of 250,000 BTU per hour.
 - (13) One (1) heater with a maximum capacity of 260,000 BTU per hour.
 - (14) Three (3) heaters each with a maximum capacity of 950,000 BTU per hour.
 - (15) One (1) heater with a maximum capacity of 1,250,000 BTU per hour.
 - (16) One (1) heater with a maximum capacity of 1,500,000 BTU per hour.
 - (17) Two (2) heaters each with a maximum capacity of 2,500,000 BTU per hour.
 - (18) Four (4) heaters each with a maximum capacity of 3,400,000 BTU per hour.
 - (19) Two (2) heaters each with a maximum capacity of 5,000,000 BTU per hour.
- (j) One Hundred and Ten (110) Electric Arc Welders. Plant 1 has 61 MIG stations with the maximum average hourly consumption of 0.98 pounds per station equivalent to 59.78 pounds per hour. In addition the Plant 1 has one (1) submerged arc and one (1) TIG Welder with maximum electrode consumption of 0.97 pounds per hour. Plant 2 has 44 MIG stations with actual average hourly consumption of 0.84 pounds per station equivalent to 36.96 pounds per hour.
- (k) Five (5) burners in Plant 1 are as follow:
 - (1) Oxy burner (Jack Line 1410) with a 0.75-inch metal thickness cut and 90 in/min cutting rate.
 - (2) Plasma burner (Jack Line 2610) with a 0.75-inch metal thickness cut and 90 in/min cutting rate.
 - (3) Laser burner (Arm Cell North 2311) with a 1-inch metal thickness cut and 90 in/min cutting rate.

- (4) Laser burner (Arm Cell South 2312) with a 1-inch metal thickness cut and 90 in/min cutting rate.
 - (5) Cincinnati Laser Burner (Building B 1430) with a 0.6-inch metal thickness cut and 90 in/min cutting rate.
- (l) Three (3) burners in Plant 2 are as follow:
- (1) Plasma burner (Runway 3810 back) with a 0.75-inch metal thickness cut and 60 in/min cutting rate.
 - (2) Plasma burner (Low Rise 3225 middle) with a 1-inch metal thickness cut and 20 in/min cutting rate.
 - (3) Plasma burner (Rolling Bridge 3320 front) with a 0.75-inch metal thickness cut and 90 in/min cutting rate.
- (m) Four (4) electric powered Powder Paint Infrared Curing ovens (two (2) in Plant 1 and two (2) in Plant 2).
- (n) A number of vessels storing lubricating oils, used oil, hydraulic oils, machining oils, etc including the following:
- (1) Vessels located in Building H:
 - (A) 275-Gallon Diesel Tank.
 - (B) Used Oil Tank 1 in South Section (500 Gallons).
 - (C) Used Oil Tank 2 in South Section (500 Gallons).
 - (D) Used Oil Tank in Center Section (350 Gallons) and
 - (E) 55-Gallon Drums containing Used Oil (number on hand varies from 0 to less than 10)
 - (2) One (1) RP-25 Oil Tank (55 Gallons) located in Building F.
 - (3) One (1) 275-Gallon Used Oil Tank for Used Oil Furnace located in Building J.
 - (4) Vessels located in Building A:
 - (A) Six (6) 55-Gallon Oil Dispensing Drums; and
 - (B) Okuma Machine (OP 2525) (165 Gallons of water-coolant mixture).
- (o) Application of Oil Coating in Dip Tank.
- (p) Machining operations include a number of machines with different names, but all of them consist of one or more of the following: Saws, lathes, drills or mills (mills are like wood planes for metal). The material being machined is steel and an aqueous cutting coolant continuously floods the machining interface.
- (q) Degreasing operations that do not exceed 145 gallons per 12 months consisting of degreaser which is a standard parts washer, a cold cleaner.
- (r) Five (5) closed non-vented Rotary Tumblers (three (3) located in Plant 1 and two (2) located in Plant 2) used for cleaning or deburring metal products without abrasive blasting.*
- (s) Two (2) enclosed Powder Paint Booths located at Plant 1, with negligible emissions and no exhaust.

- (t) Two (2) enclosed Powder Paint Booths located at Plant 2, with negligible emissions and no exhaust.
- (u) One (1) Assembly Operation, identified as EU 36, and associated with the Arm Cell process is the last step before shipping. This may include bolting parts together, putting parts into shipping containers and banding the various shipping containers together to prepare a specific model of the product for shipment.*
- (v) Two (2) Excess Shot removal operations associated with the two (2) shotblasters (EU 1-1 and EU 2-1 respectively) are used to blow any remaining shot residue off of the cleaned parts using compressed air before they are painted.*
- (w) Six (6) Final Assembly consist of packaging the various parts needed to make a final product for shipping. This may include bolting parts together, putting parts into shipping containers and banding the various shipping containers together to prepare a specific model of the product for shipment.*

* *There are no emissions from these operations.*

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1 shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

-
- (a) This permit, MSOP 077-22872-00011, is issued for a fixed term of five (5) years from the issuance date of this permit, 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 of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information

-
- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by Authorized Individual as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by Authorized Individual of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) Authorized Individual is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual 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) The annual notice 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, 46204-2251
- (c) 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.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:
 - (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; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to MSOP 077-22872-00011 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with [326 IAC 2-6.1-7].

B.13 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by the "Authorized Individual" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) 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) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments are governed by 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 shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(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)]

B.15 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]

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

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.17 Transfer of Ownership or Operational Control [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 change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by "Authorized Individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice only changes addressed in the request for notice only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing.

- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.19 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to 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.3 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.4 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).

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by "Authorized Individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.6 Performance Testing [326 IAC 3-6]

- (a) 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 protocol submitted by the Permittee does not require certification by "Authorized Individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by "Authorized Individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

C.8 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.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.10 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement the parameters.

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

C.11 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.12 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit 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 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 Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

- (a) 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, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by "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. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Wet Paint Line consisting of one (1) Baking Enamel Paint Booth, identified as EU 1-2, installed in 1985, with a nominal capacity of 5 gallons of paint per hour, using dry filters as particulate control exhausting to two (2) stacks (S/V 1-19 and 1-20).
- (b) One (1) Epoxy Paint Line consisting of one (1) Epoxy Paint Booth, identified as (EU 2-2), installed in 1988, with a nominal capacity of 6 gallons of paint per hour, using dry filters as particulate control, and exhausting to three (3) stacks (S/V 2-9 thru 2-11).
- (c) One (1) Shot Blaster with an integral Baghouse that uses cartridge filters, identified as (EU 1-1), with a nominal capacity of 6,000 pounds of steel and 30 pounds of Steel Shot per hour and exhausts back inside of the building.
- (d) One (1) Shot Blaster with an integral Baghouse that uses cartridge filters, identified as (EU 2-1), with a nominal capacity of 6,000 pounds of steel and 50 pounds of Steel Shot per hour, with dry filter particulate control and exhausting to stack (S/V 2-8).

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

Emission Limitations and Standards

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 one (1) Wet Paint Booth (Baking Enamel), identified as EU 1-2 and one (1) Epoxy Paint Booth, identified as EU 2-2 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.3 Particulate [326 IAC 6-3-2(d)]

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

- (a) 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.1.4 Particulate [326 IAC 6-2-3]

- (a) Pursuant to 326 IAC 6-3-2, the particulate from the shotblasters identified as EU 1-1 and EU 1-2 respectively, shall be limited to 8.59 pounds per hour and 8.61 pounds per hour respectively, when operating at a process weight rate of 6,030 pounds per hour and 6,050 pounds per hour respectively. These limits are determined using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

D.1.5 Particulate Control

In order to comply with Conditions D.1.3 and D.1.4 the baghouses for particulate control shall be in operation and control emissions from the shotblasters identified as EU 1-1 and EU 2-1 at all times that the shot blasters are in operation.

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

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on 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;

- (b) To document compliance with Condition D.1.3 and D.1.4, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**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:	Rotary Lift
Address:	2700 Lanier Drive,
City:	Madison, Indiana 47250
Phone #:	812-273-1622
MSOP #:	077-22872-00011

I hereby certify that Rotary Lift is

- still in operation.
- no longer in operation.

I hereby certify that Rotary Lift is

- in compliance with the requirements of MSOP 077-22872-00011.
- not in compliance with the requirements of MSOP 077-22872-00011.

Authorized Individual (typed):
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:

MALFUNCTION REPORT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-6865

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 ?_____, 100TONS/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 PERM 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: ____/____/19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ _____ 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**

Addendum to the
Technical Support Document for Minor Source Operating Permit

Source Name:	Rotary Lift
Source Location:	2700 Lanier Drive, Madison, Indiana 47250
County:	Jefferson
SIC Code:	3534
Permit Reviewer:	Surya Ramaswamy / EVP

On November 15, 2006, the Office of Air Quality (OAQ) had a notice published in the Madison Courier, Madison, Indiana, stating that Rotary Lift had applied for a Minor Source Operating Permit (MSOP) to operate a two automotive hydraulic lift manufacturing facility. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 12, 2006, Harold Hunt, Vice-President of Global Operations at Rotary Lift submitted comments on the proposed MSOP. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1:

MSOP Section A.1 General Information – The General Source Phone should be **(812) 273-1622**.

Response 1:

The following changes have been made to Section A.1 as requested.

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 source that consists of two automotive hydraulic lift manufacturing plants.

Authorized Individual:	Harold Hunt, Vice President of Global Operations
Source Address:	2700 Lanier Drive, Madison, Indiana 47250
Mailing Address:	P.O. Box 1560, 2700 Lanier Drive, Madison, Indiana 47250
General Source Phone:	(812) 265-1622 (812) 273-1622
SIC Code:	3534

Comment 2 & 3:

MSOP Section A.2 (k) (3) Emissions Units and Pollution Control Equipment Summary – The emission unit should be identified as "**Laser** burner (Arm Cell North 2311) with a 1-inch metal thickness cut and 90 in/min cutting rate."

MSOP Section A.2 (k) (4) Emissions Units and Pollution Control Equipment Summary – The emission unit should be identified as "**Laser** burner (Arm Cell South 2312) with a 1-inch metal thickness cut and 90 in/min cutting rate."

Response 2 & 3:

The following changes have been made to Section A.2 as requested.

A.2 Emissions Units and Pollution Control Equipment Summary

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

....

- (k) Five (5) burners in Plant 1 are as follow:
- (1) Oxy burner (Jack Line 1410) with a 0.75-inch metal thickness cut and 90 in/min cutting rate.
 - (2) Plasma burner (Jack Line 2610) with a 0.75-inch metal thickness cut and 90 in/min cutting rate.
 - (3) ~~Plasma~~ **Laser** burner (Arm Cell North 2311) with a 1-inch metal thickness cut and 90 in/min cutting rate.
 - (4) ~~Plasma~~ **Laser** burner (Arm Cell South 2312) with a 1-inch metal thickness cut and 90 in/min cutting rate.
 - (5) Cincinnati Laser Burner (Building B 1430) with a 0.6-inch metal thickness cut and 90 in/min cutting rate.

Comment 4:

MSOP Section B.13 Permit Renewal – The incorrect IDEM address is listed.

Response 4:

All references to IDEM, OAQ's mailing address have been revised as follows:

Indiana Department of Environmental Management
Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Comment 5 & 6:

Technical Support Document: Permitted Emission Units and Pollution Control Equipment (k) (3) – The emission unit should be identified as "**Laser** burner (Arm Cell North 2311) with a 1-inch metal thickness cut and 90 in/min cutting rate."

Technical Support Document: Permitted Emission Units and Pollution Control Equipment (k) (4) – The emission unit should be identified as "**Laser** burner (Arm Cell South 2312) with a 1-inch metal thickness cut and 90 in/min cutting rate."

Response 5 & 6:

OAQ agrees with the request to change the language under Permitted Emission Units and Pollution Control Equipment. These revisions will not affect any conditions in Section D of the permit. The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the technical support document that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. The TSD should have read as follows:

Permitted Emission Units and Pollution Control Equipment

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

- (k) Five (5) burners in Plant 1 are as follow:
- (1) Oxy burner (Jack Line 1410) with a 0.75-inch metal thickness cut and 90 in/min cutting rate.
 - (2) Plasma burner (Jack Line 2610) with a 0.75-inch metal thickness cut and 90 in/min cutting rate.
 - (3) ~~Plasma~~ **Laser** burner (Arm Cell North 2311) with a 1-inch metal thickness cut and 90 in/min cutting rate.
 - (4) ~~Plasma~~ **Laser** burner (Arm Cell South 2312) with a 1-inch metal thickness cut and 90 in/min cutting rate.
 - (5) Cincinnati Laser Burner (Building B 1430) with a 0.6-inch metal thickness cut and 90 in/min cutting rate.

Comment 7:

The notice mailed to Rotary Lift was addressed to Phil Wotring, a former employee. Please correct IDEM's records to ensure that all future correspondence related to air permitting is addressed to the Authorized Individual listed in the proposed permit – i.e., Vice-President of Global Operations.

Response 7:

IDEM's record has been updated to show Harold Hunt, Vice President of Global Operations, as the Authorized Individual. All the future correspondence related to air permitting will be addressed to him.

**Indiana Department of Environmental Management
Office of Air Quality**

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

Source Background and Description

Source Name:	Rotary Lift
Source Location:	2700 Lanier Drive, Madison, Indiana 47250
County:	Jefferson
SIC Code:	3534
Operation Permit No.:	T077-7652-00011
Operation Permit Issuance Date:	April 23, 2004
Permit No.:	077-22872-00011
Permit Reviewer:	Surya Ramaswamy / EVP

The Office of Air Quality (OAQ) has reviewed an application from Rotary Lift relating to the operation of two automotive hydraulic lift manufacturing plants. The source was issued Part 70 Permit No. T077-7652-00011 on April 23, 2004.

History

On March 30, 2006, IDEM, OAQ received an application from Rotary Lift requesting a transition from their existing Part 70 Permit No. T077-7652-00011 issued on April 23, 2004 to MSOP. This application includes the reformulation of the various epoxy and enamel paints to decrease the contents of hazardous air pollutants (HAPs) and volatile organic compounds (VOCs). In addition, Rotary Lift has implemented or intends to implement other measures within the plant to reduce HAP and VOC emissions. As a result, Rotary's potential to emit would be below the title V thresholds and can therefore qualify for a Minor Source Operating Permit.

Source Definition

This automotive hydraulic lift manufacturing company consists of two (2) plants (Plant 1 and Plant 2). Both plants are located at 2700 Lanier Drive, Madison, IN 47250.

Since the two (2) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) Wet Paint Line consisting of one (1) Baking Enamel Paint Booth, identified as EU 1-2, installed in 1985, with a nominal capacity of 5 gallons of paint per hour, using dry filters as particulate control exhausting to two (2) stacks (S/V 1-19 and 1-20).
- (b) One (1) Epoxy Paint Line consisting of one (1) Epoxy Paint Booth, identified as (EU 2-2), installed in 1988, with a nominal capacity of 6 gallons of paint per hour, using dry filters as particulate control, and exhausting to three (3) stacks (S/V 2-9 thru 2-11).

- (c) Three (3) Wash Tanks, each of which is the 1st stage of either a 3 stage washer or a 2 stage washer. The wash tank identified as EU 1-3 installed in 1996 is part of a 3 stage washer, and the wash tanks identified as EU 2-3 installed in 1996 and EU 2-4 installed in 1997, are each part of separate 2 stage washers. The three (3) Wash Tanks (EU 1-3, 2-3 and 2-4) each have a maximum capacity of 2.5 tons steel per hour, and exhaust through stacks S/V 1-4, 2-15, and 2-2, respectively.
- Note: The three (3) wash tanks system uses a non-VOC containing solvent (LCP-515), therefore there are no VOC emissions from 2006.*
- (d) One (1) Shot Blaster with an integral Baghouse that uses cartridge filters, identified as (EU 1-1), with a nominal capacity of 6,000 pounds of steel and 30 pounds of Steel Shot per hour and exhausts back inside of the building.
- (e) One (1) Shot Blaster with an integral Baghouse that uses cartridge filters, identified as (EU 2-1), with a nominal capacity of 6,000 pounds of steel and 50 pounds of Steel Shot per hour, with dry filter particulate control and exhausting to stack (S/V 2-8).
- (f) One (1) natural gas fired Curing/Drying Oven with a cooling area for the Wet Paint Line, with a maximum capacity of 3.2 MMBTU per hour and exhausting to two (2) stacks (S/V 1-9 and S/V 1-48).
- (g) One (1) natural gas fired Curing/Drying Oven with a cooling area for the Epoxy Paint Line, with a maximum capacity of 4.0 MMBTU per hour and exhausting to two (2) stacks (S/V 2-4 and S/V 2-1).
- (h) One (1) Used Oil Furnace Clean Burn, identified as Model CB-90 AH, with a maximum capacity of 0.185 MMBTU per hour.
- (i) Natural gas heaters with propane back-up with maximum capacities as listed below:
- (1) One (1) heater with a maximum capacity of 0.06 MMBTU per hour.
 - (2) Two (2) heaters each with a maximum capacity of 0.074 MMBTU per hour.
 - (3) One (1) heater with a maximum capacity of 0.075 MMBTU per hour.
 - (4) Fifteen (15) heaters each with a maximum capacity of 0.080 MMBTU per hour.
 - (5) Two (2) heaters each with a maximum capacity of 0.10 MMBTU per hour.
 - (6) One (1) heater with a maximum capacity of 0.115 MMBTU per hour.
 - (7) One (1) heater with a maximum capacity of 120,000 BTU per hour.
 - (8) Three (3) heaters each with a maximum capacity of 125,000 BTU per hour.
 - (9) Two (2) heaters each with a maximum capacity of 145,000 BTU per hour.
 - (10) Four (4) heaters each with a maximum capacity of 180,000 BTU per hour.
 - (11) Two (2) heaters each with a maximum capacity of 205,000 BTU per hour.
 - (12) One (1) heater with a maximum capacity of 250,000 BTU per hour.
 - (13) One (1) heater with a maximum capacity of 260,000 BTU per hour.
 - (14) Three (3) heaters each with a maximum capacity of 950,000 BTU per hour.
 - (15) One (1) heater with a maximum capacity of 1,250,000 BTU per hour.
 - (16) One (1) heater with a maximum capacity of 1,500,000 BTU per hour.
 - (17) Two (2) heaters each with a maximum capacity of 2,500,000 BTU per hour.
 - (18) Four (4) heaters each with a maximum capacity of 3,400,000 BTU per hour.
 - (19) Two (2) heaters each with a maximum capacity of 5,000,000 BTU per hour.
- (j) One Hundred and Ten (110) Electric Arc Welders. Plant 1 has 61 MIG stations with the maximum average hourly consumption of 0.98 pounds per station equivalent to 59.78 pounds per hour. In addition the Plant 1 has one (1) submerged arc and one (1) TIG Welder with maximum electrode consumption of 0.97 pounds per hour. Plant 2 has 44 MIG stations with actual average hourly consumption of 0.84 pounds per station equivalent to 36.96 pounds per hour.

- (k) Five (5) burners in Plant 1 are as follow:
 - (1) Oxy burner (Jack Line 1410) with a 0.75-inch metal thickness cut and 90 in/min cutting rate.
 - (2) Plasma burner (Jack Line 2610) with a 0.75-inch metal thickness cut and 90 in/min cutting rate.
 - (3) Plasma burner (Arm Cell North 2311) with a 1-inch metal thickness cut and 90 in/min cutting rate.
 - (4) Plasma burner (Arm Cell South 2312) with a 1-inch metal thickness cut and 90 in/min cutting rate.
 - (5) Cincinnati Laser Burner (Building B 1430) with a 0.6-inch metal thickness cut and 90 in/min cutting rate.

- (l) Three (3) burners in Plant 2 are as follow:
 - (1) Plasma burner (Runway 3810 back) with a 0.75-inch metal thickness cut and 60 in/min cutting rate.
 - (2) Plasma burner (Low Rise 3225 middle) with a 1-inch metal thickness cut and 20 in/min cutting rate.
 - (3) Plasma burner (Rolling Bridge 3320 front) with a 0.75-inch metal thickness cut and 90 in/min cutting rate.

- (m) Four (4) electric powered Powder Paint Infrared Curing ovens (two (2) in Plant 1 and two (2) in Plant 2).

- (n) A number of vessels storing lubricating oils, used oil, hydraulic oils, machining oils, etc including the following:
 - (1) Vessels located in Building H:
 - (A) 275-Gallon Diesel Tank.
 - (B) Used Oil Tank 1 in South Section (500 Gallons).
 - (C) Used Oil Tank 2 in South Section (500 Gallons).
 - (D) Used Oil Tank in Center Section (350 Gallons) and
 - (E) 55-Gallon Drums containing Used Oil (number on hand varies from 0 to less than 10)
 - (2) One (1) RP-25 Oil Tank (55 Gallons) located in Building F.
 - (3) One (1) 275-Gallon Used Oil Tank for Used Oil Furnace located in Building J.
 - (4) Vessels located in Building A:
 - (A) Six (6) 55-Gallon Oil Dispensing Drums; and
 - (B) Okuma Machine (OP 2525) (165 Gallons of water-coolant mixture).

- (o) Application of Oil Coating in Dip Tank.

- (p) Machining operations include a number of machines with different names, but all of them consist of one or more of the following: Saws, lathes, drills or mills (mills are like wood planes for metal). The material being machined is steel and an aqueous cutting coolant continuously floods the machining interface.

- (q) Degreasing operations that do not exceed 145 gallons per 12 months consisting of degreaser which is a standard parts washer, a cold cleaner.

- (r) Five (5) closed non-vented Rotary Tumblers (three (3) located in Plant 1 and two (2) located in Plant 2) used for cleaning or deburring metal products without abrasive blasting.*
- (s) Two (2) enclosed Powder Paint Booths located at Plant 1, with negligible emissions and no exhaust.
- (t) Two (2) enclosed Powder Paint Booths located at Plant 2, with negligible emissions and no exhaust.
- (u) One (1) Assembly Operation, identified as EU 36, and associated with the Arm Cell process is the last step before shipping. This may include bolting parts together, putting parts into shipping containers and banding the various shipping containers together to prepare a specific model of the product for shipment.*
- (v) Two (2) Excess Shot removal operations associated with the two (2) shotblasters (EU 1-1 and EU 2-1 respectively) are used to blow any remaining shot residue off of the cleaned parts using compressed air before they are painted.*
- (w) Six (6) Final Assembly consist of packaging the various parts needed to make a final product for shipping. This may include bolting parts together, putting parts into shipping containers and banding the various shipping containers together to prepare a specific model of the product for shipment.*

* There are no emissions from these operations.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Existing Approvals

The source was issued a Part 70 Operating Permit No. T077-7652-00011 on April 23, 2004. The source has since received the following:

- (a) First Significant Permit Modification No.:077-22063-00011 issued on March 17, 2006.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification for the baghouse that uses cartridge filters be considered as an integral part of the Plant 1 Descaler (Shot Blaster) (EU1-1), and the Plant 2 Shot Blaster (EU2-1):

- (a) The shotblast machines use steel shots as media for cleaning the parts for further machining, painting, or other processing. In all cases, a part free from fines is essential to quality in the process. The baghouse system evacuates the fines (from spent shot and scales removed from the parts) which would otherwise decrease the efficiency of the system by reducing the mass of the shot being thrown at the parts and by interfering with the contact of clean shot with the part surface. Operation of the shotblast system without the baghouse would result in parts that do not meet the necessary standards for use in the subsequent operation.

- (b) The baghouses are necessary for the recycling of the shotblast media. The systems are designed for such recycling to take place and could not be operated otherwise. The recycling is performed because of the large rate of shot through the system. If shot were not recycled, the system would run out of shot in less than one minute. Shot would need to be put into the system almost continuously if there were no recycle. This would result in the use of approximately 100,000 tons per year of shot. Rotary Lift currently uses less than one drum of shot every week at each shot blaster. The steel shot costs over \$100/ton to replace. Therefore, the reuse of shot results in significant cost savings.
- (c) The baghouse protects the fan that creates the draft from the working surface. Without the baghouse cartridge filter, particulate would directly impact the fan blades and degrade them to the point where the draft required to evacuate the fines generated by the shot blast operation would not be achieved and damaged shot would not be eliminated. If the damaged shot is not removed, it reduces the efficiency of the blast unit. This would result in part quality that would not be accepted by the customer.
- (d) The baghouse systems are interlocked with the shotblasting operation. The system is programmed to require that the baghouse system be activated for the shotblasting operation to start. Further, the system would have to be completely re-wired and reprogrammed to override the interlock.
- (e) Baghouses have been included in shot blaster design long before environmental regulations. A Wheelabrator Co. catalog dating back to 1940 has been found showing shot blasters with baghouses. Use of baghouses decades before the Clean Air Act was in place demonstrates that the primary purposes of the baghouses were process considerations and not air pollution control. This also demonstrates that baghouses would be used even if no air pollution control laws applied.
- (f) Daily, and quarterly inspections are performed on the baghouses. The daily inspections include inspecting the baghouse doors, seals, and discharge tubes from the hopper to the collection drums located below the dust collector, checking the fan, and baghouse pressure drop. Rotary Lift's maintenance crew enter the dust collector on a quarterly basis to inspect the condition of the cartridge filters. The manometer used to monitor the pressure drop is also checked. The following items are also inspected quarterly: the collector housing, cleaning system, material discharge system, fan, and airflow rates.

IDEM, OAQ has evaluated the above justifications and agreed that the baghouse system using cartridge filters will be considered as an integral part of the Plant 1 Descaler (Shot Blaster) (EU1-1), and Plant 2 Shot Blaster (EU2-1). Therefore, the permitting level will be determined using the potential to emit after the cartridge filters. Operating conditions in the proposed permit will specify that the baghouse using cartridge filters shall operate at all times when Plant 1 Descaler (Shot Blaster) (EU1-1), and Plant 2 Shot Blaster (EU2-1) are in operation.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner 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.

An application for the purposes of this review was received on on March 29, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (Appendix A, pages 1 through 11).

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	41.8
PM-10	42.9
SO ₂	0.3
VOC	85.0
CO	16.8
NO _x	20.1

HAPs	Potential to Emit (tons/yr)
Xylene	9.17
Hexane	0.35
Lead	0.14
Maganese	0.14
Total	15.2

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of other regulated pollutants are less than 100 tons per year, 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 the potential to emit (as defined in 326 IAC 2-7-1(29)) of the combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not a major source of HAPs as defined in 326 IAC 2-7-1 (22).
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

County Attainment Status

The source is located in Jefferson County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Nonattainment (Madison Township)
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	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 ozone. Jefferson County has been designated as attainment or unclassifiable for 8-hr ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Madison Township in Jefferson County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (c) Jefferson 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.
- (d) On August 7, 2006, a temporary emergency rule took effect revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate this change into 326 IAC 1-4-1. A permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.
- (e) 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 (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	6.9
PM-10	8.0
SO ₂	0.30
VOC	85.0
CO	16.80
NO _x	20.10
Single HAP	9.17
Combination HAPs	15.2

- (a) This existing source is not a major stationary source for the purpose of PSD and nonattainment NSR because no attainment regulated pollutant is emitted at a rate of 250 tons per year, and 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.
- (b) These emissions are based upon the Appendix A for this MSOP Permit.

Federal Rule Applicability

- (a) The requirements of the New Source Performance Standard (NSPS), 40 CFR 60.110b, Subpart Kb are not included in the permit for the used oil tanks and diesel tanks in the source, because each tank has a capacity less than 75 cubic meters.
- (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 permit.
- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants for surface coating of miscellaneous metal parts and products (40 CFR Part 63.3880, Subpart M) are not included in the permit because this source consisting of surface coating operation is not a major source of HAPs. The potential to emit of any combination of HAPs and any single HAP is less than 25 and 10 tons per year, respectively.
- (d) The requirements of the National Emission Standards for Halogenated Solvent Cleaning, Subpart T, 40 CFR 63 are not included in the permit for the degreasing operation because the source does not use any regulated halogenated solvents in the degreasing operation.

State Rule Applicability – Entire Source

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

The operation of natural gas combustion, waste oil combustion, shot blasting, welding and surface coating operation will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake or Porter counties, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

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 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.

State Rule Applicability – Individual Facilities

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 one (1) Wet Paint (Baking Enamel) Booth (identified as EU 1-2) and one (1) Epoxy Paint Booth (identified as EU 2-2) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried 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 by OAQ, both spray booths are in compliance with this requirement by using only coatings that comply with the VOC emission limit.

326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the two (2) paint booths (EU 1-2 and EU 2-2) shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with the manufacturer's specifications.
- (b) Pursuant to 326 IAC 6-3-2(e) (Particulate Emissions Limitations for Manufacturing Process), the particulate from the shotblasters identified as EU 1-1 and EU 1-2, shall be limited to 8.59 pounds per hour and 8.61 pounds per hour, respectively, when operating at a process weight rate of 6,030 pounds per hour and 6,050 pounds per hour, respectively. These limits are determined using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

The particulate matter cartridge filter shall be in place at all times the shotblasters are in operation, in order to comply with these limits.

- (c) The potential to emit of particulate emissions from welding activities with 61 stations, one (1) submerged arc, and (1) TIG welder located in Plant 1 and 44 stations located in Plant 2 are less than 0.551 pounds per hour. Pursuant to 326 IAC 6-3-1(b)(14), all these units are exempt from particulate emission limitations for manufacturing processes.
- (d) The potential to emit of particulate emissions from machining operations are less than 0.551 pounds per hour. Pursuant to 326 IAC 6-3-1(b)(14), this unit is exempt from particulate emission limitations for manufacturing processes.

326 IAC 8-1-6 (General Reduction Requirements)

326 IAC 8-1-6 (General Reduction Requirements) does not apply because the surface coating facilities are subject to other provisions of article 8 (326 IAC 8-2-9).

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This rule applies to stationary vessels used to store volatile organic liquid (VOL) that are located in Clark, Floyd, Lake or Porter County. Since the storage vessels at this source are located in Jefferson County this rule does not apply. Moreover, 326 IAC 8-9-2 exempts vessels with a design capacity of less than or equal to four hundred twenty thousand (420, 000) gallons used for petroleum or condensate stored, processed or treated prior to custody transfer. The total capacity of storage vessels at this source is less than four hundred twenty thousand (420, 000) gallons. Therefore, pursuant to 326 IAC 8-9-2 the storage vessels at this source are exempted from the requirements of 326 IAC 8-9.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements are not applicable to this source.

Conclusion

The operation of paint manufacturing facility shall be subject to the conditions of the Minor Source Operating Permit 077-22872-00011.

Appendix A: Emission Calculations

Company Name: Rotary Lift
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
Permit No. 077-22872
Plt ID: 077-00011
Reviewer: Surya Ramaswamy/EVP
Date: 5/20/2006

Uncontrolled Potential Emissions (tons/year)						
Emissions Generating Activity						
Pollutant	Waste (Used) Oil Combustion	Natural Gas Combustion	Surface Coating Plant 1 & Plant 2	Welding & Cutting Plant 1 & Plant 2	Shot Blasting Plant 1 & Plant 2	TOTAL
PM	0.12	0.40	28.28	5.60	7.40	41.8
PM10	0.10	1.50	28.28	5.60	7.40	42.9
SO ₂	0.19	0.10	0.00	0.00	0.00	0.3
NO _x	0.09	20.00	0.00	0.00	0.00	20.1
VOC	0.01	1.10	83.89	0.00	0.00	85.0
CO	0.01	16.80	0.00	0.00	0.00	16.8
total HAPs	0.15	0.36	14.41	0.28	0.00	15.2
worst case single HAP	0.1457 (Lead)	0.35 (Hexane)	9.17 (Xylene)	0.19 (Manganese)	0.00	9.17 (Xylene)
Total emissions based on rated capacity at 8,760 hours/year.						
Controlled Potential Emissions (tons/year)						
Emissions Generating Activity						
Pollutant	Waste (Used) Oil Combustion	Natural Gas Combustion	Surface Coating Plant 1 & Plant 2	Welding & Cutting Plant 1 & Plant 2	Shot Blasting Plant 1 & Plant 2	TOTAL
PM	0.12	0.40	0.57	5.60	0.22	6.9
PM10	0.10	1.50	0.57	5.60	0.22	8.0
SO ₂	0.19	0.10	0.00	0.00	0.00	0.3
NO _x	0.09	20.00	0.00	0.00	0.00	20.1
VOC	0.01	1.10	83.89	0.00	0.00	85.0
CO	0.01	16.80	0.00	0.00	0.00	16.8
total HAPs	0.16	0.36	14.41	0.28	0.00	15.2
worst case single HAP	0.1457 (Lead)	0.35 (Hexane)	9.17 (Xylene)	0.19 (Manganese)	0.00	9.21 (Xylene)
Total emissions based on rated capacity at 8,760 hours/year, after control.						

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Plant 1: Enamel Paint Booth (Wet Paint Line)**

**Company Name: Rotary Lift
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
Permit No. 077-22872
Pit ID: 077-00011
Reviewer: Surya Ramaswamy/EVP
Date: 5/20/2006**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics) *	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat per hour (gal/hr)	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
Blue Enamel (LS-12389A)	8.53	50.52%	25.3%	25.22%	0.0%	40.18%	3.210	2.15	2.15	6.91	165.73	30.25	11.87	5.35	80%
Red Enamel (LS-12414)	8.54	52.93%	25.5%	27.39%	0.0%	37.42%	0.690	2.34	2.34	1.61	38.74	7.07	2.43	6.25	80%
Yellow Enamel (LS-12404)	8.54	52.92%	25.3%	27.64%	0.0%	37.44%	0.610	2.36	2.36	1.44	34.56	6.31	2.15	6.30	80%
Black Enamel (LS-12415)	8.32	52.69%	25.5%	27.20%	0.0%	39.16%	0.200	2.26	2.26	0.45	10.86	1.98	0.69	5.78	80%
All Other Enamels	8.48	52.27%	25.4%	26.87%	0.0%	38.55%	0.330	2.28	2.28	0.75	18.05	3.29	1.17	5.91	80%
Methyl Acetate (Line Cleaning)	7.77	100.00%	0.0%	0.00%	0.0%	0.00%	0.970	0.00	0.00	0.00	0.00	0.00	0.00		100%

State Potential Emissions

Add worst case coating to all solvents

11.16	267.94	48.90	18.31
Control Efficiency =	98.00%		
Controlled PM Emission =	0.37		

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

* The pounds of VOC per gallon of coating (less water) used in these calculations are less than those shown on the attached Marcus Paint Company MSDS sheets. The reason for this is that the Marcus Paint Company calculates the VOC content of its paint as if the exempt solvents (Methyl Acetate and P-Chlorobenzotrifluoride) are not part of the formulation (like water is normally treated). The Indiana Regulations applicable to Rotary Lift (326-IAC-8-2-9) delivered to a coating applicator." Therefore, Rotary Lift calculates :
 all Marcus Paint Company coating volatile organic compound values as follows: (Wt/gallon)*(Volatile Wt. % - Exempt Solvent Wt%) = lb VOC/gallon

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Plant 2: Epoxy Paint Line

Company Name: Rotary Lift
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
Permit No.: 077-22872
Plt ID: 077-00011
Reviewer: Surya Ramaswamy/EVP
Date: 5/20/2006

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat per hour (gal/hr)	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
Blue Epoxy (LS12443)	10.02	26.910%	0.0%	26.87%	0.0%	62.26%	0.400	2.69	2.69	1.08	25.85	4.72	2.57	4.32	80%
Red Epoxy (LS12445)	10.41	24.200%	0.0%	24.20%	0.0%	65.27%	0.160	2.52	2.52	0.40	9.67	1.77	1.11	3.86	80%
Yellow Epoxy (SP11498)	9.52	28.150%	0.0%	28.15%	0.0%	60.45%	0.070	2.68	2.68	0.19	4.50	0.82	0.42	4.43	80%
Black Epoxy (LS12444)	9.61	28.780%	0.0%	28.74%	0.0%	60.72%	0.220	2.76	2.76	0.61	14.58	2.66	1.32	4.55	80%
All Other Epoxy	10.27	27.010%	0.0%	27.01%	0.0%	62.18%	0.070	2.77	2.77	0.19	4.66	0.85	0.46	4.46	80%
Epoxy Converter (SP11496)	8.12	39.900%	0.0%	39.90%	0.0%	54.48%	0.960	3.24	3.24	3.11	74.65	13.62	4.10	5.95	80%
Line Flush Solvent (SP12243)	6.88	100.000%	0.0%	100.00%	0.0%	0.00%	0.350	6.88	6.88	2.41	57.79	10.55	0.00		100%

State Potential Emissions

Add worst case coating to all solvents

7.99

191.70

34.99

9.97

METHODOLOGY

Controlled PM Emission =

0.20

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

**Appendix A: Emission Calculations
HAP Emission Calculations
From Surface Coating Operations
Plant 1: Enamel Paint Booth (Wet Paint Line)**

**Company Name: Rotary Lift
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
Permit No. 077-22872
Plt ID: 077-00011
Reviewer: Surya Ramaswamy/EVP
Date: 5/20/2006**

Material	Density (lb/gal)	Gal of Mat per hour (gal/hour)*	Weight % Xylene	Weight % Formaldehyde	Weight % Ethyl Benzene	Weight % Cumene	Weight % Triethylamine	Weight % Methanol	Weight % MIBK	Weight % Toluene	Xylene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Triethylamine emissions (ton/yr)	Methanol emissions (ton/yr)	MIBK emissions (ton/yr)	Toluene emissions (ton/yr)	Total Combined HAPs Emissions (ton/yr)
Blue Enamel (LS-12389A)	8.53	3.21	0.17%	0.29%	0.02%	0.16%	0.13%	0.02%	0.01%	0.00%	0.21	0.35	0.03	0.19	0.16	0.03	0.01	0.00	0.97
Red Enamel (LS-12414)	8.54	0.69	0.21%	0.24%	0.03%	0.20%	0.10%	0.02%	0.00%	0.00%	0.05	0.06	0.01	0.05	0.03	0.01	0.00	0.00	0.21
Yellow Enamel (LS-12404)	8.54	0.61	0.08%	0.23%	0.02%	0.08%	0.10%	0.02%	0.00%	0.01%	0.02	0.05	0.00	0.02	0.02	0.00	0.00	0.00	0.12
Black Enamel (LS-12415)	8.32	0.20	0.18%	0.29%	0.03%	0.18%	0.13%	0.02%	0.01%	0.00%	0.01	0.02	0.00	0.01	0.01	0.00	0.00	0.00	0.06
All Other Enamels	8.48	0.33	0.21%	0.29%	0.03%	0.20%	0.13%	0.02%	0.01%	0.01%	0.03	0.04	0.00	0.02	0.02	0.00	0.00	0.00	0.11

Total State Potential Emissions **0.32 0.53 0.05 0.30 0.23 0.04 0.01 0.00 1.47**

METHODOLOGY

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

* The parts coated on Rotary Lift's paint lines range in size from 6 inches square to over 20 feet long. These are parts of different models of a dozen types of lifts. All of these parts are required to make the finished products. Therefore, taking the gallons needed to coat the biggest part and multiplying that value by maximum number of the smallest parts that could be painted in an hour gives an answer that is physically impossible to achieve. The best way to do these calculations is on gallons of paints applied per hour. The highest annual value from year 1997 to 2001 production records were used. It is not possible to calculate a meaningful maximum due to the diversity of parts coated.

NOTE:
A factor of **1.02673** was used to multiply all potential to emit of each HAP for each of the material except for Clean Solvent in order to account for an increase in volume from other baking enamels.

**Appendix A: Emission Calculations
HAP Emission Calculations
From Surface Coating Operations
Plant 2: Epoxy Paint Line**

**Company Name: Rotary Lift
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
Permit No.: 077-22872
Plt ID: 077-00011
Reviewer: Surya Ramaswamy/EVP
Date: 5/20/2006**

Material	Density (Lb/Gal)	Gal of Mat per hour (gal/hour)*	Weight % Xylene	Weight % Formaldehyde	Weight % Ethyl Benzene	Weight % Cumene	Weight % Toluol	Weight % Methanol	Weight % Methyl Isobutyl Ketone	Xylene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Toluol emissions (ton/yr)	Methanol emissions (ton/yr)	Methyl Isobutyl Ketone emissions (ton/yr)	Total Combined HAPs (ton/yr)
Blue Epoxy (LS12443)	10.02	0.400	3.02%	0.03%	0.09%	0.24%	5.48%	0.02%	0.00%	0.55	0.00	0.02	0.04	1.00	0.00	0.00	1.62
Red Epoxy (LS12445)	10.41	0.160	2.28%	0.02%	0.08%	0.18%	12.07%	0.00%	0.00%	0.17	0.00	0.01	0.01	0.92	0.00	0.00	1.11
Yellow Epoxy (SP11498)	9.52	0.070	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.30	0.30
Black Epoxy (LS12444)	9.61	0.220	3.24%	0.03%	0.10%	0.25%	0.00%	0.02%	0.00%	0.31	0.00	0.01	0.02	0.00	0.00	0.00	0.35
All Other Epoxy	10.27	0.070	3.24%	0.03%	0.10%	0.25%	12.07%	0.02%	10.00%	0.11	0.00	0.00	0.01	0.40	0.00	0.33	0.84
Epoxy Converter (SP11496)	8.12	0.960	14.50%	0.00%	2.87%	0.00	0.00	0.00	0.00%	4.95	0.00	0.98	0.00	0.00	0.00	0.00	5.93
Line Flush Solvent (SP12243)	6.88	0.350	26.36%	0.00%	0.00%	0.00	0.00	0.00	0.00%	2.78	0.00	0.00	0.00	0.00	0.00	0.00	2.78

Total State Potential Emissions

8.87 0.01 1.01 0.09 2.32 0.01 0.63 12.94

METHODOLOGY

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

* The parts coated on Rotary Lift's paint lines range in size from 6 inches square to over 20 feet long.

These are parts of different models of a dozen types of lifts. All of these parts are required to make the finished products.

Therefore, taking the gallons needed to coat the biggest part and multiplying that value by maximum number of the smallest

parts that could be painted in an hour gives an answer that is physically impossible to achieve. The best way to do these calculations

is on gallons of paints applied per hour. The highest annual value from year 1997 to 2001 production records were used. It is not possible to calculate

a meaningful maximum due to the diversity of parts coated.

NOTE:

A factor of 1.04112 was used to multiply the each potential to emit calculation for each of the HAP except for the Cleaning Solvent and the 2-PKG Epoxy Converter Clear to account for the 4.112% volume increase from other epoxy part A paints.

Appendix A: Welding and Thermal Cutting
Company Name: Rotary Lift (Plant 1)
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
Permit No.: 077-22872
Plt ID: 077-00011
Reviewer: Surya Ramaswamy/EVP
Date: 5/20/2006

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING												
Submerged Arc	1	0.97		0.036	0.011			0.035	0.01067			0.011
Metal Inert Gas (MIG)(ER5154)	61	0.97		0.0055	0.0005	0.00001	0.00001	0.325	0.029585	0.001	0.0005917	0.031
Stick (E7018 electrode)	0	0										0.000
Tungsten Inert Gas (TIG)(carbon steel)	1	0.97		0.0055	0.0005			0.005	0.000485			0.000
Oxyacetylene(carbon steel)	0	0										0.000
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick) [#]				EMISSIONS (lbs/hr)				TOTAL HAPS (lb/hr)
FLAME CUTTING					Mn	Ni	Cr		Mn	Ni	Cr	
Oxy Burner	1	0.75	90		0.0005	0.0001	0.0003		0.002	0.000	0.001	0.004
EMISSION TOTALS									Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr								0.37	0.04	0.00	0.00	0.05
Potential Emissions lbs/day								8.78	1.03	0.00	0.04	1.09
Potential Emissions tons/year								1.60	0.19	0.00	0.01	0.20

METHODOLGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.

[#] Data supplied by the source. Emission factors based upon the maximum possible metal removal rate (from Manufacturer's Specifications for each unit)

and the Air Pollution Engineering Manual emission factor for scarfing (a very similar operation). Emission factor is 0.0015lb of particulate per pound of metal removed.

This is found on page 640 of the Air Pollution Engineering Manual, Copyright 1992, Van Nostrand Reinhold, New York, NY.

Maximum Emission Capacity = totals of max for each machine 2.047 ton

Alt calculation AP-42 Scarfing 0.1 lb/ton of material produced 1.007 ton

Appendix A: Welding and Thermal Cutting
Company Name: Rotary Lift (Plant 2)
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
Permit No.: 077-22872
Pit ID: 077-00011
Reviewer: Surya Ramaswamy/EVP
Date: 5/20/2006

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPS (lb/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Submerged Arc	0		0								0.000
Metal Inert Gas (MIG)(ER5154)	44	0.84	0.0055	0.0005	0.00001	0.00001	0.203	0.01848	0.000	0.0003696	0.019
Stick (E7018 electrode)	0	0	0.0211								0.000
Tungsten Inert Gas (TIG)(carbon steel)	0	0	0.0055								0.000
Oxyacetylene(carbon steel)	0	0	0.0055								0.000
EMISSION TOTALS							PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr							0.20	0.02	0.00	0.00	0.02
Potential Emissions lbs/day							4.88	0.44	0.00	0.01	0.46
Potential Emissions tons/year							0.89	0.08	0.00	0.00	0.08

METHODOLGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.

Data supplied by the source. Emission factors based upon the maximum possible metal removal rate (from Manufacturer's Specifications for each unit)

and the Air Pollution Engineering Manual emission factor for scarfing (a very similar operation). Emission factor is 0.0015lb of particulate per pound of metal removed.

This is found on page 640 of the Air Pollution Engineering Manual, Copyright 1992, Van Nostrand Reinhold, New York, NY.

Maximum Emission Capacity = totals of max for each machine 2.047 ton

Alt calculation AP-42 Scarfing 0.1 ib/ton of material produced 1.007 ton

Appendix A: Welding and Thermal Cutting

Company Name: Rotary Lift (Plant 1)

Burning, Laser and Plasma Operations

Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250

Permit No.: 077-22872

Plt ID: 077-00011

Reviewer: Surya Ramaswamy/EVP

Date: 5/20/2006

Thickness	inch/min	Kerf	Volume	Removed Weight lb/hr	Emissions by AP-40 lb/hr	lb/day	tons/yr
Oxy Burner (Jack Line 1410)							
0.000	230	0.08	0.00	0.00	0.000	0.00	0.000
0.125	230	0.08	2.30	35.94	0.054	1.29	0.236
0.250	200	0.08	4.00	62.50	0.094	2.25	0.411
0.375	170	0.08	5.10	79.69	0.120	2.87	0.524
0.500	130	0.08	5.20	81.25	0.122	2.93	0.534
0.750	90	0.08	5.40	84.38	0.127	3.04	0.554
Plasma Burner (Jack Line 2610)							
0.000	230	0.08	0.00	0.00	0.000	0.00	0.000
0.125	230	0.08	2.30	35.94	0.054	1.29	0.236
0.250	200	0.08	4.00	62.50	0.094	2.25	0.411
0.375	170	0.08	5.10	79.69	0.120	2.87	0.524
0.500	130	0.08	5.20	81.25	0.122	2.93	0.534
0.750	90	0.08	5.40	84.38	0.127	3.04	0.554
Laser Burner (Arm Cell North 2311)							
0.000	230	0.08	0.00	0.00	0.000	0.00	0.000
0.125	230	0.08	2.30	35.94	0.054	1.29	0.236
0.250	200	0.08	4.00	62.50	0.094	2.25	0.411
0.375	170	0.08	5.10	79.69	0.120	2.87	0.524
0.500	130	0.08	5.20	81.25	0.122	2.93	0.534
0.750	90	0.08	5.40	84.38	0.127	3.04	0.554
0.875	60	0.08	4.20	65.63	0.098	2.36	0.431
1.000	20	0.08	1.60	25.00	0.038	0.90	0.164
Laser Burner (Arm Cell South 2312)							
0.000	230	0.08	0.00	0.00	0.000	0.00	0.000
0.125	230	0.08	2.30	35.94	0.054	1.29	0.236
0.250	200	0.08	4.00	62.50	0.094	2.25	0.411
0.375	170	0.08	5.10	79.69	0.120	2.87	0.524
0.500	130	0.08	5.20	81.25	0.122	2.93	0.534
0.750	90	0.08	5.40	84.38	0.127	3.04	0.554
0.875	60	0.08	4.20	65.63	0.098	2.36	0.431
1.000	20	0.08	1.60	25.00	0.038	0.90	0.164
Cincinnati Laser Burner (Building B 1430)							
0.000	150	0.0156	0.00	0.00	0.000	0.00	0.000
0.090	100	0.0156	0.14	2.19	0.003	0.08	0.014
0.120	110	0.0156	0.21	3.22	0.005	0.12	0.021
0.150	100	0.0156	0.23	3.66	0.005	0.13	0.024
0.180	90	0.0156	0.25	3.95	0.006	0.14	0.026
0.250	60	0.0156	0.23	3.66	0.005	0.13	0.024
0.300	58	0.0156	0.27	4.24	0.006	0.15	0.028
0.350	50	0.0156	0.27	4.27	0.006	0.15	0.028
0.400	33	0.0156	0.21	3.22	0.005	0.12	0.021
0.600	20	0.0156	0.19	2.93	0.004	0.11	0.019

Appendix A: Welding and Thermal Cutting

Company Name: Rotary Lift (Plant 2)

Burning, Laser and Plasma Operations

Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250

Permit No.: 077-22872

Plt ID: 077-00011

Reviewer: Surya Ramaswamy/EVP

Date: 5/20/2006

Thickness	inch/min	Kerf	Volume	Removed Weight	Emissions by AP-40	lb/day	tons/yr
				lb/hr	lb/hr		
Plasma Burner (Runway 3810 back)							
0.188	110	0.070	1.45	22.62	0.034	0.81	0.149
0.250	160	0.070	2.80	43.75	0.066	1.58	0.287
0.313	120	0.070	2.63	41.08	0.062	1.48	0.270
0.375	100	0.070	2.63	41.02	0.062	1.48	0.269
0.438	100	0.070	3.07	47.91	0.072	1.72	0.315
0.500	80	0.070	2.80	43.75	0.066	1.58	0.287
0.563	90	0.045	2.28	35.63	0.053	1.28	0.234
0.625	70	0.062	2.71	42.38	0.064	1.53	0.278
0.688	60	0.062	2.56	39.99	0.060	1.44	0.263
0.866	50	0.062	2.68	41.95	0.063	1.51	0.276
0.984	40	0.062	2.44	38.14	0.057	1.37	0.251
1.000	40	0.062	2.48	38.75	0.058	1.40	0.255
Plasma burner (Low Rise 3225 middle)							
0.062	60	0.08	0.30	4.65	0.007	0.17	0.031
0.125	60	0.08	0.60	9.38	0.014	0.34	0.062
0.250	50	0.08	1.00	15.63	0.023	0.56	0.103
0.375	40	0.08	1.20	18.75	0.028	0.68	0.123
0.500	30	0.08	1.20	18.75	0.028	0.68	0.123
0.750	20	0.08	1.20	18.75	0.028	0.68	0.123
Plasma Burner (Rolling Bridge 3320 front)							
0.000	230	0.08	0.00	0.00	0.000	0.00	0.000
0.125	275	0.08	2.75	42.97	0.064	1.55	0.282
0.250	135	0.08	2.70	42.19	0.063	1.52	0.277
0.375	95	0.08	2.85	44.53	0.067	1.60	0.293
0.500	64	0.08	2.56	40.00	0.060	1.44	0.263
0.188	126	0.08	1.90	29.61	0.044	1.07	0.195
0.875	60	0.08	4.20	65.63	0.098	2.36	0.431
1.000	20	0.08	1.60	25.00	0.038	0.90	0.164

Note: Emission factor is 0.0015 lb of particulate per pound of metal removed. This is found on page 640 of the Air Pollution Engineering Manual, Copyright 1992, Van Nostrand Reinhold, New York, NY.

Maximum Emission Capacity (Plant 1 & Plant 2) = totals of max for each machi 3.114 Ton

Appendix A: Process Particulate Emissions
Company Name: Rotary Lift
Shot Blasting

Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
Permit No. 077-22872
Pit ID: 077-00011
Reviewer: Surya Ramaswamy/EVP
Date: 5/20/2006

State Potential Emissions (tons/year)					
A. Baghouses					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Maximum Air Flow (acfm)	Control Efficiency	Total (tons/yr)
#1-1	1	0.01000	7700.0	0.00%	2.89
Total Emissions Based on Rated Capacity at 8,760 Hours/Year					2.89
Federal Potential Emissions (tons/year)					
A. Baghouses					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Maximum Air Flow (acfm)	Control Efficiency	Total (tons/yr)
#1-1	1	0.01000	7700.0	97.00%	0.09
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls					0.09

Methodology:

State Potential (uncontrolled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Federal Potential (controlled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Appendix A: Process Particulate Emissions
Company Name: Rotary Lift
Shot Blasting

Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
Permit No. 077-22872
Pit ID: 077-00011
Reviewer: Surya Ramaswamy/EVP
Date: 5/20/2006

State Potential Emissions (tons/year)					
A. Baghouses					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Maximum Air Flow (acfm)	Control Efficiency	Total (tons/yr)
#2-1	1	0.01000	12000.0	0.00%	4.51
Total Emissions Based on Rated Capacity at 8,760 Hours/Year					4.51
Federal Potential Emissions (tons/year)					
A. Baghouses					
Process	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Maximum Air Flow (acfm)	Control Efficiency	Total (tons/yr)
#2-1	1	0.01000	12000.0	97.00%	0.14
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls					0.14

Methodology:

State Potential (uncontrolled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Federal Potential (controlled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

**Company Name: Rotary Lift
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
Permit No.: 077-22872
Plt ID: 077-00011
Reviewer: Surya Ramaswamy/EVP
Date: 5/20/2006**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
45.6 from 49 Heaters & 2 Ovens	399.7

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.4	1.5	0.1	20.0	1.1	16.8

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included)

HAPs - Organics

Emission Factor in lb/MMcf	Benzene	e	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	4.196E-04	2.398E-04	1.499E-02	3.597E-01	6.794E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	9.991E-05	2.198E-04	2.798E-04	7.593E-05	4.196E-04

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Waste Oil Combustion
Furnace with Used Oil Burner**

**Company Name: Rotary Lift
Address City IN Zip: 2700 Lanier Drive, Madison, IN 47250
Permit No.: 077-22872
Plt ID: 077-00011
Reviewer: Surya Ramaswamy/EVP
Date: 5/20/2006**

Heat Input Capacity
MMBtu/hr

0.185

Potential Throughput
kgals/year

11.6589928

A = Weight % Ash = 0.3
L = Weight % Lead = 0.5
S = Weight % Sulfur = 0.3

Pollutant

	PM*	PM10*	SO2	NOx	TOC	CO	Pb
Emission Factor in lb/kgal	19.8 (66A)	17.10 (57A)	32.1 (107S)	16.0	1.0	2.1	25.0000 (50L)
Potential Emission in tons/yr	0.1154	0.0997	0.1871	0.0933	0.0058	0.0122	0.1457

*No information was given in AP-42 regarding whether the PM/PM10 emission factors included filterable and condensable PM.

Pollutant

	Arsenic	Cadmium	Chromium	Manganese	Nickel	Cobalt
Emission Factor in lb/kgal	6.0E-02	1.2E-02	1.8E-01	5.0E-02	1.6E-01	5.2E-03
Potential Emission in tons/yr	3.50E-04	7.00E-05	1.05E-03	2.91E-04	9.33E-04	3.03E-05

Methodology

Emission Factor Units are lb/1000 gal

A = weight% ash in fuel, L = weight% lead in fuel, S = weight % sulfur in fuel

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.139 MM Btu

Emission Factors from AP-42, Chapter 1.11, SCC 1-03-013-02 (Supplement B 10/96)

Emission (tons/yr) = Throughput kgals per year x Emission Factor (lb/kgal)/2,000 lb/ton