TO: Interested Parties / Applicant

RE: Ershigs, Inc., IPL – Harding Stack Liner Project / 097-23188-00588

FROM: Felicia A. Robinson
Administrator

Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days 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 Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures

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

August 29, 2006

Mr. Bruce Smith
Safety/Environmental Director
Ershigs, Inc., IPL – Harding Stack Liner Project
P.O. Box 1707
Bellingham, Washington 98227

CERTIFIED MAIL

Re: Registered Construction and Operation Status,
097-23188-00588

Dear Mr. Smith:

The application from Ershigs, Inc., IPL – Harding Stack Liner Project, received on June 7, 2006, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1, it has been determined that the on-site fabrication of reinforced plastics for breeching liner and stack liner for the new Unit 70 stack and Flue Gas Desulfurization (FGD) Scrubber project to be located at 3700 South Harding Street, Indianapolis, Indiana, 46217, is classified as registered:

(a) One (1) non-atomized open molding reinforced plastics manufacturing process utilizing one (1) resin bath and two (2) electrically heated 250 gallon resin storage day tanks for the on-site fabrication and installation of breeching liner and stack liner for the new Unit 70 stack project at the IPL – Harding Street Generating Station. Maximum corrosion resistant resin usage of 1,045 pounds per hour and 94.8 tons for the duration of the on-site fabrication project. The plastics manufacturing resin contains styrene and the manufacturing process consists of:

(1) One (1) filament winding machine and mandrel for resin application, identified as emission unit ID Filament Winding, maximum capacity of six hundred (600) pounds of resin per hour, exhausting to stack/vent 001.

(2) One (1) non-atomized flow coat chopper gun, identified as emission unit ID Non-Atomized Mechanical, maximum capacity of four hundred (400) pounds of resin per hour, exhausting to stack/vent 001.

(3) One (1) manual layup process for resin utilizing brushes, rollers and the hand application of resin, identified as emission unit ID Manual Layup, maximum capacity of forty five (45) pounds of resin per hour, exhausting to stack/vent 001.

(b) Two (2) cold cleaner degreasing tanks, utilizing non-HAP dibasic ester solvent, with combined maximum surface area of 76 ft^2, identified as emission unit ID 004, exhausting to stack/vent 001.

(c) One (1) horizontal unheated above ground fixed roof storage tank, maximum storage capacity of 10,000 gallons, used to store resin containing styrene, identified as emission unit ID 005.

(d) One (1) propane fuel fired space heater, maximum heat input of 3.5 million BTU per hour, identified as emission unit ID 006, exhausting to stack/vent 001.

Department of Public Works
Office of Environmental Services
2700 Belmont Avenue
Indianapolis, IN 46221
317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw

The following conditions shall be applicable:

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

(1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

(b) Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), 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) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

(1) Equip the cleaner with a cover;

(2) Equip the cleaner with a facility for draining cleaned parts;

(3) Close the degreaser cover whenever parts are not being handled in the cleaner;

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) Provide a permanent, conspicuous label summarizing the operation requirements; and

(6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

(d) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility

must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(A) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(B) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(C) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius ($48.9^{O}C$) (one hundred twenty degrees Fahrenheit ($120^{O}F$)):

(i) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(ii) A water cover when solvent is used is insoluble in, and heavier than, water.

(iii) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(e) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

Compliance Data Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204-2251

and

Office of Environmental Service, Compliance Data Group
City of Indianapolis
2700 S. Belmont Avenue
Indianapolis, IN 46221

no later than March 1 of each year, with the annual notice being submitted in the format attached.

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

Sincerely,

Original Signed by Felicia A. Robinson

Felicia A. Robinson
Administrator

MBC

Enclosure: Technical Support Document

cc: File
Air Compliance – Matt Mosier
IDEM, OAQ – Mindy Hahn
Marion County Health Department
Nysa James, Indianapolis Power & Light Company

Registration
Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3).

Company Name:	Ershigs, Inc., IPL – Harding Stack Liner Project
Address:	3700 South Harding Street
City:	Indianapolis
Authorized individual:	Bruce Smith
Phone #:	(360) 733-2620
Registration #:	097-23188-00588

I hereby certify that Ershigs, Inc., IPL – Harding Stack Liner Project is still in operation and is in compliance with the requirements of Registration **097-23188-00588**.

Name (typed):
Title:
Signature:
Date:

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

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name:	**Ershigs, Inc., IPL – Harding Stack Liner Project**
Source Location:	**3700 South Harding Street, Indianapolis, Indiana 46217**
County:	**Marion**
SIC Code:	**3089**
Operation Permit No.:	**097-23188-00588**
Permit Reviewer:	**M. Caraher**

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services (OES) have reviewed an application from Ershigs, Inc., IPL – Harding Stack Liner Project relating to the construction and operation of a reinforced plastics manufacturing process under the Standard Industrial Classification (SIC) Code 3089, establishments primarily engaged in manufacturing plastics products. As a construction subcontractor, Ershigs, Inc., IPL – Harding Stack Liner Project (hereafter referred to as Ershigs), is performing the on-site fabrication of breeching liner and a stack liner for the new Unit 70 stack and Flue Gas Desulfurization (FGD) Scrubber project.

Source Definition

The source is located adjacent and/or contiguous to an existing Part 70 Operating Permit Program source, the Indianapolis Power & Light Company – Harding Street Station (T097-6566-00033). IDEM, OAQ and OES examined whether these two sources should be considered one "major source" as defined at 326 IAC 2-7-1(22). In order for these two sources to be considered one major source, they must meet all three of the following criteria:

(1) the sources must be under common ownership or common control;
(2) the sources must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
(3) the sources must be located on contiguous or adjacent properties.

IDEM, OAQ and OES have determined that Ershigs and Indianapolis Power & Light Company – Harding Street Station are separate sources and are not one major source because:

(a) Ershigs does not have the same two-digit Standard Industrial Classification (SIC) Code as the Indianapolis Power & Light Company – Harding Street Station. Ershigs two digit SIC Code is 30, because it is primarily engaged in manufacturing plastics products and the Indianapolis Power & Light Company – Harding Street Station's two digit SIC Code is 49, because it is primarily engaged in the generation, transmission or distribution of electric energy for sale.

(b) Ershigs does not support the primary activity of the site (establishments engaged in the generation, transmission or distribution of electric energy for sale) in a production process and does not provide any raw materials or product to the Indianapolis Power & Light Company – Harding Street Station. The Indianapolis Power & Light Company – Harding

Street Station does not provide any raw materials or product to Ershigs. Therefore, a support relationship between the two entities does not exist.

(c) The liner fabrication process does not have to occur adjacent or contiguous to the Indianapolis Power & Light Company – Harding Street Station. Fabrication could occur off-site. Ershigs location at this site is for its convenience.

Therefore, Registration 097-23188-00588 will be issued to Ershigs based on the potential to emit regulated air pollutants from this source (see Potential to Emit of the Source Before Controls Section of this TSD and Appendix A page 5).

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) non-atomized open molding reinforced plastics manufacturing process utilizing one (1) resin bath and two (2) electrically heated 250 gallon resin storage day tanks for the on-site fabrication and installation of breeching liner and stack liner for the new Unit 70 stack project at the IPL – Harding Street Generating Station. Maximum corrosion resistant resin usage of 1,045 pounds per hour and 94.8 tons for the duration of the on-site fabrication project. The plastics manufacturing resin contains styrene and the manufacturing process consists of:

(1) One (1) filament winding machine and mandrel for resin application, identified as emission unit ID Filament Winding, maximum capacity of six hundred (600) pounds of resin per hour, exhausting to stack/vent 001.

(2) One (1) non-atomized flow coat chopper gun, identified as emission unit ID Non-Atomized Mechanical, maximum capacity of four hundred (400) pounds of resin per hour, exhausting to stack/vent 001.

(3) One (1) manual layup process for resin utilizing brushes, rollers and the hand application of resin, identified as emission unit ID Manual Layup, maximum capacity of forty five (45) pounds of resin per hour, exhausting to stack/vent 001.

(b) Two (2) cold cleaner degreasing tanks, utilizing non-HAP dibasic ester solvent, with combined maximum surface area of 76 ft^2, identified as emission unit ID 004, exhausting to stack/vent 001.

(c) One (1) horizontal unheated above ground fixed roof storage tank, maximum storage capacity of 10,000 gallons, used to store resin containing styrene, identified as emission unit ID 005.

(d) One (1) propane fuel fired space heater, maximum heat input of 3.5 million BTU per hour, identified as emission unit ID 006, exhausting to stack/vent 001.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (^oF)
001	non-atomized open molding process, 004 & 006	20	2.5	8000	ambient

Recommendation

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

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

An application for the purposes of this review was received on June 7, 2006, with additional information received on July 24, 2006.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A pages 1 through 5 of 5 of this document.

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	0.1
PM-10	0.1
SO_2	0.3
VOC	8.5
CO	0.3
NO_x	2.3

HAPs	Potential to Emit (tons/yr)
Styrene	6.0
Total	6.0

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) PM, PM-10, SO_2 VOC CO and NO_X are each less than twenty-five (25) tons per year. The potential to emit VOC is greater than five (5) tons per year and the source is subject to 326 IAC 8-3 (Organic Solvent Degreasing Operations). Therefore, the source is subject to the provisions of 326 IAC 2-5.5. A Registration will be issued.

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

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

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-2.5	nonattainment
PM-10	attainment
SO_2	maintenance attainment
NO_2	attainment
8-hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(b) Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM-2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM-2.5 emissions, pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.

(c) Marion County has been classified as attainment or unclassifiable in Indiana for PM-10, SO_2, NO_2, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	0.1
PM-10	0.1
SO_2	0.3
VOC	8.5
CO	0.3
NO_x	2.3
Single HAP	6.0
Combination HAPs	6.0

This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2 and 2-3, the PSD and Emission Offset requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This is the first air approval issued to this source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this Permit.

The 10,000 gallon storage tank used to store styrene and identified as emission unit ID 005 is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110b, Subpart Kb) (Standards of Performance for Volatile Organic Liquid Storage Vessels for which Construction, Reconstruction or Modification Commenced after July 23, 1984) because on October 15, 2003, U. S. EPA amended 40 CFR 60.110b to eliminate the record keeping requirement for storage vessels with storage capacity of less than 75 cubic meters (19,815 gallons). On November 13, 2005, the Indiana Air Pollution Control Board adoption of the July 1, 2004 Code of Federal Regulations (CFR) version in 326 IAC 1-1-3 (CFR References) became effective. Therefore, this source is not subject to the provisions of 40 CFR Part 60, Subpart Kb and 326 IAC 12.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (NSPS) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this Permit.

Ershigs is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP): Reinforced Plastics Composites Production, Subpart WWWW (326 IAC 20-25 and 40 CFR Part 63) because Ershigs does not have the potential to emit any single HAP of equal to or greater than ten (10) tons per year or the potential to emit a combination of HAPs of equal to or greater than twenty-five (25) tons

per year. Therefore, Ershigs is not subject to the provisions of 40 CFR Part 63, Subpart WWWW.

State Rule Applicability – Entire Source

326 IAC 1-7 (Stack Height Provisions)

This source does not have potential or actual PM or SO_2 emissions greater than twenty (25) tons per year. Therefore, the source is not subject to 326 IAC 1-7 (Stack Height Provisions).

326 IAC 2-1.1-5 (Non-attainment New Source Review)

This source is not major under nonattainment NSR because it has the potential to emit less than 100 tons of PM10 (as a surrogate for PM-2.5). Therefore, the Non-attainment New Source Review requirements are not applicable to the source.

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

This source is not a major stationary source because no attainment regulated pollutant emissions are equal to or greater than two hundred fifty (250) tons per year, this source is not one of the 28 listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and no attainment or nonattainment regulated pollutant emissions are equal to or greater than one hundred (100) tons per year. This source is to commence construction and operation in 2006. As a result, there have been no modifications or revisions to this source that were major modifications pursuant to 326 IAC 2-2 or 326 IAC 2-3. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) and 326 IAC 2-3 (Emission Offset) are each not applicable to the source.

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

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

326 IAC 2-6 (Emission Reporting)

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

326 IAC 4-2 (Incinerators)

This source does not have an incinerator. Therefore, this source is not subject to 326 IAC 4-2 (Incinerators).

326 IAC 5-1 (Opacity Limitations)

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County) and 326 IAC 6.5-6 (Marion County)

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

326 IAC 6-4 (Fugitive Dust Emissions)

This source is subject to the provisions of 326 IAC 6-4 for fugitive dust emissions. The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right of way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

326 IAC 6-5 (Fugitive Particulate Matter Emissions)

Pursuant to 326 IAC 6-5-1(b), any new source of fugitive particulate matter emissions, requiring a permit as set forth in 326 IAC 2, which has not received all the necessary preconstruction approvals before December 13, 1985, shall submit a dust control plan in all permit applications submitted to the commissioner. Pursuant to 326 IAC 6-5-3(c), any control practice or measure used to determine applicability or exemption of 326 IAC 6-5 shall be incorporated into the source's operating permit. Ershigs is not a new source of fugitive particulate matter emissions. Therefore, 326 IAC 6-5 (Fugitive Particulate Matter Emissions) does not apply to this source.

326 IAC 7 (Sulfur Dioxide Rules)

Neither the source nor any specific emission unit at this source has the potential to emit twenty five (25) tons per year or ten (10) pounds per hour of sulfur dioxide (SO_2). Therefore, this source is not subject to 326 IAC 7 (Sulfur Dioxide Rules).

326 IAC 7-4-2 (Marion County Sulfur Dioxide Emission Limitations)

Neither the source nor any specific emission unit at this source is specifically identified in 326 IAC 7-4-2. Therefore, 326 IAC 7-4-2 (Marion County Sulfur Dioxide Emission Limitations) does not apply to this source.

326 IAC 8 (Volatile Organic Compound Rules)

See discussion under State Rule Applicability – Individual Facilities of this Technical Support Document.

326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities)

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

326 IAC 9 (Carbon Monoxide Emission Rules)

There are no provisions under 326 IAC 9 (Carbon Monixide Emission Rules) applicable to any specific emission unit or operation at this source. Therefore, this source is not subject to 326 IAC 9 (Carbon Monoxide Emission Rules).

326 IAC 10 (Nitrogen Oxide Rules)

There are no provisions under 326 IAC 10 (Nitrogen Oxide Rules) applicable to any specific emission unit or operation at this source. This source has not opted in to 326 IAC 10 (Nitrogen Oxide Rules). Therefore, this source is not subject to 326 IAC 10 (Nitrogen Oxide Rules).

326 IAC 11 (Emission Limitations for Specific Types of Operations)

This non-atomized open molding reinforced plastics manufacturing operation does not perform any specific type of operation identified in 326 IAC 11 (Emission Limitations for Specific Types of

Operations). Therefore, this source is not subject to 326 IAC 11 (Emission Limitations for Specific Types of Operations).

326 IAC 12 (New Source Performance Standards)
See discussion under Federal Rule Applicability section of this Technical Support Document.

326 IAC 14 (Emission Standards for Hazardous Air Pollutants)
There are no provisions under 326 IAC 14 (Emission Standards for Hazardous Air Pollutants) and 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants) applicable to any specific emission unit or operation at this source. Therefore, this source is not subject to the provisions of 326 IAC 14 (Emission Standards for Hazardous Air Pollutants) and 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).

326 IAC 15 (Lead Rules)
Ershigs is not specifically identified in 326 IAC 15 (Lead Rules) and there are no provisions under 326 IAC 15 (Lead Rules) applicable to any specific emission unit or operation at this source. Therefore, this source is not subject to 326 IAC 15 (Lead Rules).

326 IAC 17 (Public Records; Confidential Information; Confidentiality Agreements)
This source has not filed or claimed any application, source or permit information as confidential, pursuant to 326 IAC 17-1-6 (Public Records: Confidentiality Claims), for this review and Registered Construction and Operation Status, 097-23188-00588.

326 IAC 20 (Hazardous Air Pollutants)
This source does not have the potential to emit greater than or equal to ten (10) tons per year of any hazardous air pollutant (HAP) or twenty-five (25) tons per year of any combination of HAPs. Therefore, this source is not a major source of hazardous air pollutants (HAP). As a result, this source is not subject to 326 IAC 20 (Hazardous Air Pollutants), 40 CFR Part 63 (National Emission Standards for Hazardous Air Pollutants), 326 IAC 20-19 (Group I Polymers and Resins), 326 IAC 20-19 (Group IV Polymers and Resins) and 326 IAC 20-56 (Reinforced Plastic Composites Production).

326 IAC 20-25 (Emissions from Reinforced Plastics Composites Fabricating Emission Units)
This source is not subject to the provisions of 326 IAC 20-25 because this source does not have the potential to emit greater than or equal to ten (10) tons per year of any hazardous air pollutant (HAP) or twenty-five (25) tons per year of any combination of HAPs. Therefore, 326 IAC 20-25 (Emissions from Reinforced Plastics Composites Fabricating Emission Units) does not apply to this non-atomized open molding reinforced plastics fabricating operation.

326 IAC 21 (Acid Deposition Control)
Ershigs is not subject to the Acid Rain Program Provisions of Title IV of the 1990 Clean Air Act Amendments as listed in 40 CFR Part 72 through 78 and are, therefore, not subject to 326 IAC 21 (Acid Deposition Control).

State Rule Applicability – Individual Facilities

Non-atomized open molding reinforced plastics manufacturing process

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The non-atomized open molding reinforced plastics manufacturing process is not subject to the requirements of 326 IAC 6-3-2(d) because, with a transfer efficiency of 100%, no particulate matter is emitted from this process.

326 IAC 8-2-9 (Surface Coating Emission Limitations)

This non-atomized open molding reinforced plastics fabricating operation does not perform any operations identified in 326 IAC 8-2-9 (Surface Coating Emission Limitations). Therefore, this source is not subject to 326 IAC 8-2-9 (Surface Coating Emission Limitations).

Cold cleaner degreasing, identified as emission unit ID 004

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements; and

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control)

Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

(a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(1) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(2) The solvent is agitated; or

(3) The solvent is heated.

(b) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(1) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(2) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(3) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(c) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Propane fuel fired space heater, identified as emission unit ID 006

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The propane fuel fired space heater identified as emission unit ID 006 does not produce usable heat that is transferred through a heat conducting materials barrier or by a heat storage medium to a material to be heated. As a result, emission unit ID 006 is not an indirect heating unit. Therefore, 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating) does not apply to emission unit ID 006.

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

Propane fuel fired space heaters are not specifically identified in 326 IAC 6-3-2(b) through (d). Pursuant to 326 IAC 1-2-59, “Process weight; weight rate,” states that liquid and gaseous fuels will not be considered as part of the process rate. Therefore, the propane fuel fired space heater, identified as emission unit ID 006 is not subject to 326 IAC 6-3-2(e).

Conclusion

The construction and operation of this non-atomized open molding reinforced plastics fabricating operation at the Ershigs, Inc., IPL- Harding Street Station shall be subject to the conditions of Registration 097-23188-00588.

Resin VOC/HAP losses

Appendix A: Emission Calculations
Breeching/Stack Liner Installation Emissions

Company Name: Ershigs, Inc., IPL-Harding Stack Liner Project
Address City IN Zip: 3700 South Harding Street, Indianapolis, IN 46217
Permit Number: 097-23188-00588
Plt ID: 097-00588
Reviewer: M. Caraher
Date: July 19, 2006

Layup Process	Maximum Resin Usage for the Project		Emission Factor [1] (lbs emitted/ton resin applied)	Styrene (VOC/HAP) Emissions	
Filament Winding	46.0	tons/year	157.0	3.6	tons/year
	600.0	pounds/hour	157.0	47.1	pounds/hour
Non-atomized	38.0	tons/year	91.0	1.7	tons/year
Mechanical	400.0	pounds/hour	91.0	18.2	pounds/hour
Manual	10.8	tons/year	120.0	0.6	tons/year
	45.0	pounds/hour	120.0	2.7	pounds/hour
	94.8	tons/year	***NA***	6.0	tons/year
Total	1045	pounds/hour	***NA***	68.0	pounds/hour

[1] Emission Factors from 40 CFR Part 63 Subpart WWWW Table 1(8/25/05) & based on 39.5% HAP content in resin, 0% vapor suppressant effectiveness.

Methodology:

Emissions in tons per year = Resin Usage x Table 1 Emission Factor x ton/2000 pounds

Space Heater

Appendix A: Emission Calculations
LPG-Propane -Commercial Boilers
Heat input capacity: < 10 MMBtu/hr

Company Name: Ershigs, Inc., IPL-Harding Stack Liner Project
Address City IN Zip: 3700 South Harding Street, Indianapolis, IN 46217
Permit Number: 097-23188-00588
Plt ID: 097-00588
Reviewer: M. Caraher
Date: July 19, 2006

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	SO2 Emission factor = 0.10 x S S = Sulfur Content =	15.90	grains/100ft^3
3.50	335.08			

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/kgal	0.4	0.4	1.6 *(0.10S)*	14.0	0.5 **TOC value	1.9
Potential Emission in tons/yr	0.1	0.1	0.3	2.3	0.1	0.3

*PM emission factor is filterable PM only. PM10 emission factor is assumed to be the same as PM based on a footnote in Table 1.5-1, therefore PM10 is filterable only as well.

**The VOC value given is TOC. The methane emission factor is 0.2 lb/kgal.

Methodology

1 gallon of LPG has a heating value of 94,000 Btu
1 gallon of propane has a heating value of 91,500 Btu (use this to convert emission factors to an energy basis for propane)
(Source - AP-42 (Supplement B 10/96) page 1.5-1)

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.0915 MMBtu

Emission Factors are from AP42 (Supplement B 10/96), Table 1.5-1 (SCC #1-02-010-02)

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

Degreasing Emissions

Appendix A: Emission Calculations
Degreasing VOC/HAP losses

Company Name: Ershigs, Inc., IPL-Harding Stack Liner Project
Address City IN Zip: 3700 South Harding Street, Indianapolis, IN 46217
Permit Number: 097-23188-00588
Plant ID: 097-00588
Reviewer: M. Caraher
Date: ##########

Dibasic ester degreasing solvent is non-HAP, low vapor pressure, low evaporation rate. Mass balance approach is inaccurate as resin material from cleanup compri unknown portion of spent solvent waste materials recovered. Estimate of worst case emissions based on evaporation rate model USEPA developed for non-boiling liquid pools in "Risk Management Program Guidance for Offsite Consequence Analysis", EPA-550-B-99-009, April 1999, Equation D-1, Section D.2.3, Appendix D i

$$E = \frac{(0.284)\, u^{0.78}\, M^{0.667}\, A\, P}{RT}$$

where:
- E = evaporation rate, lb/minute
- u = windspeed above the pool liquid surface, m/sec
- M = molecular weight of the pool liquid
- A = surface area of the pool liquid, ft^2
- P = vapor pressure of the pool liquid at the pool temperature, mm Hg
- T = pool liquid temperature, K
- R = universal gas law constant = 82.05 (atm)(cm^3) / (gmol) (K)

$$* E = \frac{(0.284)(2^{0.78})(160^{0.667})(76)(0.2)}{(82.05)(298)}$$

* E specific equation inputs are from the application received from Ershigs on June 7, 2006.

E =	**0.00895**	**lbs/minute**
VOC emissions in lbs/hr =	**0.537**	
VOC emissions in tons/yr =	**2.35206**	

Above ground
Styrene Storage Tank

Appendix A: Emission Calculations
Tank Storage VOC/HAP losses

Company Name: Ershigs, Inc., IPL-Harding Stack Liner Project
Address City IN Zip: 3700 South Harding Street, Indianapolis, IN 46217
Permit Number: 097-23188-00588
Plant ID: 097-00588
Reviewer: M. Caraher
Date: July 19, 2006

TANKS 4.09d
Emissions Report - Summary Format

Tank Identification	
User Identification:	Styrene Storage Tank
Type of Tank:	Horizontal
Description:	10000 gal
Tank Dimensions	
Shell Length (ft):	17.0
Diameter (ft):	10.0
Volume (gal):	15.0
Turnovers:	7.5
Net Throughput (gal/yr):	10000.0
Heated tank (y/n?)	1.9
	18960.0
Paint Characteristics	No
Shell Color/Shade:	
Shell Condition:	
	Gray/Light
Breather Vent Settings	Good
Vacuum Settings (psig):	
Pressure Settings (psig):	
	-0.03
Liquid Contents of Storage Tank	0.03
Component	
Daily Liquid Surface Temp (F)	Styrene
Avg.:	
Min.:	
Max.:	59.1
Liquid Bulk Temp (F):	50.6
	67.5
Vapor Pressure (psia):	54.5
Avg.:	
Min.:	
Max.:	0.0695
Vapor Molecular Wt.:	0.0512
Molecular Wt.:	0.0930
	104.2
	104.2

Components			
Styrene	Losses (lbs)		
	Working Loss		
	3.26		
Methodology		**Breathing Loss**	**Total Emissions**
Emission calculations based on EPA program "TANKS" Version 4.09		25.34	28.6
			0.01 (tons)

Appendix A: Emission Calculations
Emissions Summary

Company Name: Ershigs, Inc., IPL-Harding Stack Liner Project
Address City IN Zip: 3700 South Harding Street, Indianapolis, IN 46217
Permit Number: 097-23188-00588
Plant ID: 097-00588
Reviewer: M. Caraher
Date: July 19, 2006

	Pollutant						Highest	Combined
	PM	PM10	SO2	NOx	VOC	CO	Single HAP	HAP
Resin Losses	0.0	0.0	0.0	0.0	6.0	0.0	6.0	6.0
Space Heater	0.1	0.1	0.3	2.3	0.1	0.3	0.0	0.0
Degreasing	0.0	0.0	0.0	0.0	2.4	0.0	0.0	0.0
Storage Tank	0.0	0.0	0.0	0.0	0.01	0.0	0.01	0.01
Total (tons/yr)	0.1	0.1	0.3	2.3	8.5	0.3	6.0	6.0