Thomas M. McDermott, Jr.
Mayor

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
CITY OF HAMMOND
RONALD L. NOVAK
Director

October 18, 2006 Certified Mail #: 9059 7080

Timothy Shelton
Plant Manager
Henry Pratt Company
403 Conkey Street
Hammond, Indiana 46324

Re: Registered Construction and Operation Status,
R089-23364-00513

Dear Mr. Shelton:

The application from Henry Pratt Company, received on July 17, 2006 has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1, it has been determined that the following steel water valve repair and touch-up operation, to be located at 403 Conkey Street Hammond, Indiana, is classified as registered:

(a) One (1) Shot/Grit Blaster, identified as (P-1), installed in 2006, with a maximum shot/grit throughput rate of 100 pounds per hour, using a jet-pulse baghouse (BH-1) as control, and exhausting to stack (S-1).

(b) One (1) Plasma/Plate Cutter, identified as (P-2), installed in 2006, with a maximum rate of 1000 pounds per hour of product throughput, and exhausting to stack (S-2).

(c) One (1) Paint Booth, identified as (P-3), installed in 2006, with a maximum rate of one (1) gallon per hour, using a dry filter media (F-1) as control, and exhausting to stack (S-3).

The following conditions shall be applicable:

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

(a) Opacity shall not exceed an average of twenty percent (20%) 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.

Pursuant to 326 IAC 6-3-2(e), the particulate emissions from the Shot/Grit Blaster (P-1) shall be limited to 0.551 pounds per hour based on the process weight rate of 100 pounds of shot/grit throughput per hour and the following equation from the rule:

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

5925 Calumet Avenue
Hammond, IN 46320
219. 853.6306
fax: 219 853 6343

P = 0.05 tons per hour

E = 4.10 X (0.05^0.67) = 0.551 pounds per hour

Pursuant to 326 IAC 6-3-2(e), the particulate emissions from the Plasma Cutter (P-2) shall be limited to 2.58 pounds per hour based on the process weight rate of 1000 pounds per hour:

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

P = 0.5 tons per hour

E = 4.10 X (0.5^0.67) = 2.58 pounds per hour

Pursuant to 326 IAC 6-3-2(d), Paint Booth (P-3) shall be controlled by a dry particulate filter, water-wash, or an equivalent control device, subject to the following:

(1) The source shall operate the control device in accordance with manufacturer's specifications.

(2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(A) Repair the control device so that no overspray is detectable at the exhaust or accumulates on the ground.

(B) Operate the equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the source 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 detectable at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the Paint Booth (P-3) shall be limited to 3.5 pounds of VOC per gallon of coating less water; and,

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.

Pursuant to the Hammond Ordinance 7102, the Permittee shall submit an annual emission inventory containing the throughput information for each permitted unit. The emission inventory must be received by April 15th of each year. The submittal shall cover the twelve (12) consecutive month time period starting January 1st and ending December 31st. This is a local requirement only. This emission inventory must be submitted to:

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue
Hammond, Indiana 46320

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 Office of Air Quality 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

and

Hammond Department of Environmental Management
Air Pollution Control Division
5925 Calumet Avenue
Hammond, Indiana 46320

no later than March 1st 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) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original signed by:

Ronald L. Novak, Director
Hammond Department of Environmental Management

RH

cc: Mindy Hahn, IDEM-OAQ, Contract Management Section

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:	Henry Pratt Company
Address:	403 Conkey Street
City:	Hammond, Indiana 46324
Authorized individual:	Timothy Shelton or Plant Manager
Phone #:	219-931-0405
Registration #:	R089-23364-00513

I hereby certify that the Henry Pratt Company is still in operation and is in compliance with the requirements of Registration R089-23364-00513.

Name (typed):
Title:
Signature:
Date:

Indiana Department of Environmental Management
Office of Air Quality

and

Hammond Department of Environmental Management
Air Pollution Control Division

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name:	Henry Pratt Company
Source Location:	403 Conkey Street, Hammond, Indiana 46324
County:	Lake
SIC Code:	3494 – Steel Water Valves
Operation Permit No.:	R089-23364-00513
Permit Reviewer:	Ronald Holder - HDEM

The Office of Air Quality (OAQ) has reviewed an application from Henry Pratt Company relating to the construction and operation of a steel water valve repair and touch-up facility.

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) Shot/Grit Blaster, identified as (P-1), installed in 2006, with a maximum shot/grit throughput rate of 100 pounds per hour, using a jet-pulse baghouse (BH-1) as control, and exhausting to stack (S-1).

(b) One (1) Plasma/Plate Cutter, identified as (P-2), installed in 2006, with a maximum rate of 1000 pounds per hour of product throughput, and exhausting to stack (S-2).

(c) One (1) Paint Booth, identified as (P-3), installed in 2006, with a maximum rate of one (1) gallon per hour, using a dry filter media (F-1) as control, and exhausting to stack (S-3).

Unpermitted Emission Units and Pollution Control Equipment

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

Existing Approvals

There are no existing approvals at this location.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temp (^oF)
S-1	Shot Blaster (P-1)	3'	30'	10,500	85-105
S-2	Plasma Cutter (P-2)	3'	4'	6,300	85-105
S-3	Paint Booth (P-3)	3.5'	12'	15,000	65-95

Recommendation

The staff recommends to the Commissioner 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 July 17, 2006, with additional information received on September 15, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (two (2) pages).

Potential to Emit Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, 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	16.16
PM-10	15.91
SO_2	neg
VOC	15.33
CO	neg
NO_x	neg

neg - negligible

HAPs	Potential to Emit (tons/yr)
Xylene	2.73
MEK	2.82
Ethyl benzene	0.46
MIBK	1.14
Toluene	0.01
Total	7.18

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM and PM10 are less than 25 tons per year and greater than 5 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2. A new source 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, this source is not a major source of hazardous air pollutants (HAPs).

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	Attainment
PM-2.5	Nonattainment
SO_2	Attainment
NO_2	Attainment
8-hour Ozone	Moderate Nonattainment
CO	Attainment
Lead	Attainment

(a) Lake County has been classified as attainment or unclassifiable 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 following Source Status section.

(b) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as moderate nonattainment for the 8-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the following Source Status section.

(c) Lake County has been classified as nonattainment for PM-2.5. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the following Source Status section.

(d) On August 7, 2006, a temporary emergency rule took effect redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana. The Indiana Air Pollution Control Board has approved a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 will take effect prior to the expiration of the emergency rule.

(e) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake 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 non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's gudiance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the following Source Status section.

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	4.0
PM-10/PM2.5	3.9
SO_2	neg
VOC	15.3
CO	neg
NO_x	neg
Single HAP	2.8
Combination HAPs	7.2

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 the permit for this source.

(b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products, Subpart MMMM, because it is not a major source of hazardous air pollutants.

State Rule Applicability – Entire Source

326 IAC 2-1.1-5 (Nonattainment NSR)

Lake County has been designated as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled “Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas” authored by Steve Page, Director of OAQPS, until EPA promulgates the PM2.5 major NSR regulations, states should assume that a major stationary source’s PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. Therefore, a significant emissions increase for PM2.5 would be a net emissions increase or the potential of fifteen (15) tons per year or greater of PM10.

326 IAC 2-2 and 2-3 (PSD and Emission Offset)

PSD and Emission Offset applicability is discussed under the Source Status determination. This source is not a major source for the purposes of PSD and Emission Offset. Therefore, 326 IAC 2-2 and 2-3, PSD and Emission Offset requirements do not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Lake County and the potential to emit of volatile organic compounds (VOC) is less than twenty-five (25) tons per year. Therefore, 326 IAC 2-6 does not apply.

However, pursuant to the Hammond Ordinance 7102, the Permittee shall submit an annual emission inventory containing the throughput information for each permitted unit. The emission inventory must be received by April 15th of each year. The submittal shall cover the twelve (12) consecutive month time period starting January 1st and ending December 31st. This is a local requirement only. This emission inventory must be submitted to the Hammond Department of Environmental Management.

326 IAC 5-1 (Visible Emissions Limitations)

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

(a) Opacity shall not exceed an average of twenty percent (20%) 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 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the Paint Booth (P-3) 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 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2(e) the particulate emissions from the Shot/Grit Blaster (P-1) shall be limited to 0.551 pounds per hour based on the process weight rate of 100 pounds of shot/grit throughput per hour and the following equation from the rule:

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

P = 0.05 tons per hour

E = 4.10 X (0.05^0.67) = 0.551 pounds per hour

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

Pursuant to 326 IAC 6-3-2(e) the particulate emissions from the Plasma Cutter (P-2) shall be limited to 2.58 pounds per hour based on the process weight rate of 1000 pounds per hour:

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

P = 0.5 tons per hour

E = 4.10 X (0.5^0.67) = 2.58 pounds per hour

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

Pursuant to 326 IAC 6-3-2(d), Paint Booth (P-3) shall be controlled by a dry particulate filter, water-wash, or an equivalent control device, subject to the following:

(1) The source shall operate the control device in accordance with manufacturer's specifications.

(2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(A) Repair the control device so that no overspray is detectable at the exhaust or accumulates on the ground.

(B) Operate the equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the source 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 detectable at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

The Paint Booth (P-3) is not subject to the specific particulate emission limits shown in the table in subsection (e) of 326 IAC 6-3-2, because the control methods in subsection (d) apply.

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 the coating delivered to the applicator at the Paint Booth (P-3) shall be limited to 3.5 pounds of VOC per gallon of coating less water; and,

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.

In response to a letter notifying the company of the applicability of this rule, the source submitted additional information amending the original application to comply with the requirements.

Conclusion

The construction and operation of this steel water valve repair and touch-up operation shall be subject to the conditions of the New Source Construction and Registration **R089-23364-00513**.

Henry Pratt Company 403 Conkey Street Hammond, IN 46324	3494 - Steel Water Valves R089-23364-00513 Registered 326 IAC 2-5.1-2	PLANT ID NO: 089-00513 INSP DATE: N/A CALC DATE: 8/24/06	**Appendix A** calculations

CALCULATIONS BY: Ronald Holder **YEAR OF DATA:** review NO. OF POINTS: 3

EF: EMISSION FACTOR
CE: CONTROL EFFICIENCY
MDR: MAXIMUM DESIGN RATE
MDC: MAXIMUM DESIGN CAPACITY
Ts: STACK DISCHARGE TEMPERATURE
UNITS FOR EMISSIONS ARE IN (TPY) EXCEPT WHERE GIVEN

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Shot/Grit Blaster (P-1) Stack S-1

MDR (T/hr): 0.050
YEARLY PROD (T/yr): N/A
STACK ID (DIAM:HEIGHT): (3': 30')
FLOWRATE (ACFM): 10,500
Ts(°F): 85

CNTRL DEV: Jet-Pulse Baghouse (BH-1)

PERMITTED OPERATING HRS: **8760** hr/yr

SCC #3-09-002-05			POTENTIAL EMISSIONS						ALLOWABLE	
			BEFORE CONTROLS			AFTER CONTROLS				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	8	0.962	0.40	9.60	**1.75**	0.015	0.067	0.0002	0.551	2.41
PM10	6.88	0.962	0.34	8.26	**1.51**	0.013	0.057	0.0001	0.551	2.41
SOx	0	0	0.00	0.00	**0.00**	0.000	0.000	N/A	0	0.00
NOx	0	0	0.00	0.00	**0.00**	0.000	0.000	N/A	0	0.00
VOC	0	0	0.00	0.00	**0.00**	0.000	0.000	N/A	0	0.00
CO	0	0	0.00	0.00	**0.00**	0.000	0.000	N/A	0	0.00
LEAD	0	0	0.00	0.00	**0.00**	0.000	0.000	N/A	0	0.00

EF for PM = 0.004 lb PM per lb abrasive = 8 lbs/T
EF for PM10 = 0.86 lb PM10 per lb PM
BH-1 normal operating pressure drop range - 3-10 inches of water

Air Quality Handbook Vol. 1
MDR based on 100 lbs/hr throughput of shot/grit

326 IAC 6-3-2(e) - 0.551 lb/hr

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Plasma/Plate Cutter (P-2) Stack S-2

MDR (T/hr): 0.50
YEARLY PROD (T/yr): N/A
STACK ID (DIAM:HEIGHT): (3': 4')
FLOWRATE (ACFM): 6,300
Ts(°F): 85

CNTRL DEV: none

PERMITTED OPERATING HRS: **8760** hr/yr

AP-42			POTENTIAL EMISSIONS						ALLOWABLE	
			BEFORE CONTROLS			AFTER CONTROLS				
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	0.6	0	0.30	7.20	**1.31**	0.300	1.314	0.0057	2.58	11.30
PM10	0.6	0	0.30	7.20	**1.31**	0.300	1.314	0.0057	2.58	11.30
SOx	0	0	0.00	0.00	**0.00**	0.000	0.000	N/A	0	0.00
NOx	0	0	0.00	0.00	**0.00**	0.000	0.000	N/A	0	0.00
VOC	0	0	0.00	0.00	**0.00**	0.000	0.000	N/A	0	0.00
CO	0	0	0.00	0.00	**0.00**	0.000	0.000	N/A	0	0.00
LEAD	0	0	0.00	0.00	**0.00**	0.000	0.000	N/A	0	0.00

EF = 35 grains/min equivalent to 0.3 lbs/hr from
"Emission of Fume, Nitrogen Oxides and Noise in Plasma Cutting of Stainless and Mild Steel".
The Swedish Institute of Production Engineering Research, Goteborg, Sweden.
MDR based on 1000 lbs/hr of product throughput

326 IAC 6-3-2(e)
$E = 4.10P^{0.67} = 2.58$ lb/hr

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Paint Booth (P-3) Stack S-3

MDR (gal/hr): 1
YEARLY PROD (gal/yr): N/A

STACK ID (DIAM:HEIGHT): (3.5': 12')
FLOWRATE (ACFM): 15,000
Ts(°F): 85

CNTRL DEV: Dry Filter Media (F-1)

PERMITTED OPERATING HRS: **8760** hr/yr

SCC #4-02-001-10			POTENTIAL EMISSIONS							ALLOWABLE	
			BEFORE CONTROLS				AFTER CONTROLS				
POLLUTANT	EF(lb/gal)	CE (%)	(lbs/hr)	(lbs/day)	**(TPY)**		(lbs/hr)	(TPY)	(gr/dscf)	(lbs/hr)	(TPY)
PM	2.99	0.80	2.99	71.72	**13.09**		0.598	2.618	0.0048	N/A	N/A
PM10	2.99	0.80	2.99	71.72	**13.09**		0.598	2.618	0.0048	N/A	N/A
SOx	0	0	0.00	0.00	**0.00**		0.000	0.000	N/A	0	0.00
NOx	0	0	0.00	0.00	**0.00**		0.000	0.000	N/A	0	0.00
VOC	3.5	0	3.50	84.00	**15.33**		3.500	15.330	N/A	3.50	15.33
CO	0	0	0.00	0.00	**0.00**		0.000	0.000	N/A	0	0.00
single HAP	0.67	0	0.67	16.00	**2.92**		0.667	2.920	N/A	N/A	N/A
total HAPs	1.64	0	1.64	39.36	**7.18**		1.640	7.183	N/A	N/A	N/A

EF for PM & PM10 = (22,414 lbs of solids sprayed) X (40% overspray) ÷ (3000 operating hours) (2005 data from Dixon, IL facility)
EF for VOC = 326 IAC 8-2-9(d) VOC content limit - 3.5 lbs/gal.
EF for single HAP = (1.0 tons MEK) X (2000 lbs/ton) ÷ (3000 operating hours) (2005 data from Dixon, IL facility)
EF for total HAPs = (2.46 tons total HAPs) X (2000 lbs/ton) ÷ (3000 operating hours) (2005 data from Dixon, IL facility)

This is a repair and touch-up shop < 3000 gallons/yr, < 6 tpy VOC.

PM: 326 IAC 6-3-2 (d), (d)(1), and (d)(2) apply, work practices and control technologies. 326 IAC 6-3-2 (e) does not apply because control methods of subsection (d) apply.

VOC: 326 IAC 8-2-9(d) - 3.5 lbs/gal

326 8-2-1 (a)(4) - construction after 7/1/90 and actual emissions > 15 lbs/day makes 326 IAC 8-2-9 applicable.
326 8-2-9 (d)(2) - Miscellaneous Metal Coating Operations - 3.5 lbs VOC/gal

Henry Pratt Company
Plant Totals

Based on the potential emissions, this source is subject to:
326 IAC 2-5.1 Construction of New Sources and
326 IAC 2-5.1-2 Registrations

	POTENTIAL EMISSIONS					
	BEFORE CONTROLS			AFTER CONTROLS		
	(lbs/hr)	(lbs/day)	**(TPY)**	(lbs/hr)	(TPY)	(gr/dscf)
PM	3.69	88.52	**16.16**	0.91	4.00	0.0050
PM10	3.63	87.18	**15.91**	0.91	3.99	0.0049
SOx	0.00	0.00	**0.00**	0.00	0.00	N/A
NOx	0.00	0.00	**0.00**	0.00	0.00	N/A
VOC	3.50	84.00	**15.33**	3.50	15.33	N/A
CO	0.00	0.00	**0.00**	0.00	0.00	N/A

326 IAC 2-5.1-2 Construction of New Sources (Registrations)

Potential	PM or PM10	< 25 tpy and = or > 5 tpy
	VOC	< 25 and = or > 10 tpy
	Single HAP	< 10 tpy
	Total HAPs	< 25 tpy

Methodology: MDR (T/hr) x EF (lbs/T) = lbs/hr
lbs/hr x 8760 hrs/yr ÷ 2000 lbs/T = TPY