



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: April 20 ,2007
RE: Gal Fab., Inc. / 131-23462-00018
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



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Indianapolis, Indiana 46204-2251
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MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Gal Fab, Inc.
612 West 11th Street
Winamac, Indiana 46996**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

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.

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.

Operation Permit No.: M131-23462-00018	
Original Signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: April 20, 2007 Expiration Date: April 20, 2012

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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 stationary waste container manufacturing plant

Source Address:	612 West 11th Street, Winamac, Indiana 46996
Mailing Address:	P.O. Box 39, Winamac, Indiana 46996
General Source Phone Number:	(574) 946-7767
SIC Code:	3444
County Location:	Pulaski
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program
	Minor Source, under PSD
	Minor Source, Section 112 of the Clean Air Act
	Not in 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Painting operations (identified as EU-01) located at North, Middle and South Paint Rooms, constructed in 1992 and modified in 1999, with a total maximum throughput rate of 0.45 metal waste containers per hour, consisting of the following:
 - (1) Three (3) airless spray guns, with a total maximum primer usage of 2.0 gallons per metal waste container and maximum paint usage of 4.0 gallons per metal waste container, using dry filters for overspray control, and exhausting at stacks S1 and S2.
 - (2) One (1) clean-up process, with a maximum clean-up usage of 0.30 gallons per metal waste container.
 - (3) One (1) caustic metal wash process, with a maximum caustic detergent usage of 1.40 gallons per metal waste container.
 - (4) One (1) metal preparation process, with a maximum solvent usage equal to 0.37 gallons per metal waste container.
- (b) One (1) touch-up spray painting process using spray cans (identified as IA-1), constructed after 1990, with a maximum usage rate of 0.01 gallons of coating per hour, using dry filters for overspray control. The touch-up spray painting is performed at the North, Middle, and South Paint Rooms, listed under painting operation (EU-01).
- (c) Welding and cutting operations, constructed in 1992, exhausting inside the building and consisting of the following:
 - (1) Forty-six (46) MIG welding stations, each with a maximum wire consumption rate of 1.50 pounds per hour.
 - (2) Two (2) stick welding stations, each with a maximum electrode consumption rate of 1.80 pounds per hour.

- (3) One (1) TIG welding station, with a maximum wire consumption rate of 2.0 pounds per hour.
- (4) Fifteen (15) oxyacetylene cutters, each with a maximum cutting rate of 20 inches per minute and the maximum thickness of the metal is 0.25 inches.
- (5) One (1) oxypropylene cutter, with a maximum cutting rate of 40 inches per minute and the maximum thickness of the metal is 2.0 inches.
- (d) Natural gas-fired space heaters and make-up air heaters, with a combined maximum total heat input of 5.40 MMBtu per hour.
- (e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (f) Degreasing operations that do not exceed 145 gallons per 12 months, and are not subject to 326 IAC 20-6. [326 IAC 8-3]
- (g) One (1) steel machining process, including shearing, pressing and punching of cold steel, constructed in 1992, with a maximum throughput rate of 4,000 pounds of steel per hour, and exhausting into the building. The machining utilizes an aqueous coolant to continuously flood the machining interface. [326 IAC 6-3]
- (h) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

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, 131-23462-00018, 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 an "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 an "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) An "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, Indiana 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) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 131-23462-00018 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, 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 and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this.
- (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][IC 13-17-3-2][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 the conditions of this permit;
- (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 facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (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 Operation [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 an "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 a 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 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 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.7 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 an "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.8 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 an "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 an "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.9 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.10 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.

Corrective Actions and Response Steps

C.11 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120)

days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

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

C.12 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.13 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.14 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 an "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 FACILITY OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (a) Painting operations (identified as EU-01) located at North, Middle and South Paint Rooms, constructed in 1992 and modified in 1999, with a total maximum throughput rate of 0.45 metal waste containers per hour, consisting of the following:
- (1) Three (3) airless spray guns, with a total maximum primer usage of 2.0 gallons per metal waste container and maximum paint usage of 4.0 gallons per metal waste container, using dry filters for overspray control, and exhausting at stacks S1 and S2.
 - (2) One (1) clean-up process, with a maximum clean-up usage of 0.30 gallons per metal waste container.
 - (3) One (1) caustic metal wash process, with a maximum caustic detergent usage of 1.40 gallons per metal waste container.
 - (4) One (1) metal preparation process, with a maximum solvent usage equal to 0.37 gallons per metal waste container.
- (b) One (1) touch-up spray painting process using spray cans (identified as IA-1), constructed after 1990, with a maximum usage rate of 0.01 gallons of coating per hour, using dry filters for overspray control. The touch-up spray painting is performed at the North, Middle, and South Paint Rooms, listed under painting operation (EU-01).

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

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

D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, for painting operations (identified as EU-01), the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating excluding water, as delivered to the applicator for extreme performance 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 of painting operations (identified as EU-01) 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)]

- (a) Particulate from the painting operations (identified as EU-01) 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 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content contained in Condition 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 Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit 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, less water.
 - (2) The amount of coating material and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (f) Degreasing operations that do not exceed 145 gallons per 12 months, and are not subject to 326 IAC 20-6. [326 IAC 8-3]

(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.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee 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;
- (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.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee 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°C) (one hundred (100) degrees Fahrenheit (100°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°C) (one hundred degrees Fahrenheit (100°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.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) 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 (33°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°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 or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, 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.

SECTION D.3 FACILITY OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (g) One (1) steel machining shaping process, including shearing, pressing and punching of cold steel, constructed in 1992, with a maximum throughput rate of 4,000 pounds of steel per hour, and exhausting into the building. The machining utilizes an aqueous coolant to continuously flood the machining interface. [326 IAC 6-3]

(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.3.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the steel shaping process shall not exceed 6.25 pounds per hour, when operating at a process weight rate of 4,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour;
and P = process weight rate in tons per hour

**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:	Gal Fab, Inc.
Address:	612 West 11th Street
City:	Winamac, Indiana 46996
Phone #:	(574) 946-7767
MSOP #:	131-23462-00018

I hereby certify that Gal Fab, Inc. is :

still in operation.

no longer in operation.

I hereby certify that Gal Fab, Inc. is :

in compliance with the requirements of MSOP
131-23462-00018.

not in compliance with the requirements of MSOP
131-23462-00018.

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: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ 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
COMPLIANCE DATA SECTION**

**MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION**

Source Name: Gal Fab, Inc.
Source Address: 612 West 11th Street, Winamac, Indiana 46996
Mailing Address: P.O. Box 39, Winamac, Indiana 46906
MSOP No.: M131-23462-00018

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Test Result (specify)_____
- Report (specify)_____
- Notification (specify)_____
- Affidavit (specify)_____
- Other (specify)_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Minor Source Operating Permit

Source Background and Description

Source Name:	Gal Fab, Inc.
Source Location:	612 West 11th Street, Winamac, Indiana 46996
County:	Pulaski
SIC Code:	3444
Operating Permit No.:	M131-23462-00018
Permit Reviewer:	ERG/SD

On February 28, 2007, the Office of Air Quality (OAQ) had a notice published in the Pulaski County Journal, Winamac, Indiana, stating that Gal Fab, Inc. had applied for a Minor Source Operating Permit to operate an existing stationary waste container manufacturing plant. 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 March 2, 2007, Gal Fab, Inc. submitted comments on the proposed Permit No.: M131-23462-00018. The summary of the comments is as follows (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been updated as needed.

Comment 1:

The Permittee requested the facility description for the touch-up spray operation listed under A.2 (b) be revised to indicate that there is no booth associated with this operation. This operation is used in conjunction with the painting operations identified as EU-01.

Response to Comment 1:

Facility description under Section A.2 and D.1 have been revised as shown.

A.2 Emission Units and Pollution Control Equipment Summary

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

...

- (b) One (1) touch-up spray painting ~~booth~~ **process** using spray cans (identified as IA-1), constructed after 1990, with a maximum usage rate of 0.01 gallons of coating per hour, using dry filters for overspray control. **The touch-up spray painting is performed at the North, Middle, and South Paint Rooms, listed under painting operation (EU-01).**

SECTION D.1 FACILITY OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (a) Painting operations (identified as EU-01) located at North, Middle and South Paint Rooms, constructed in 1992 and modified in 1999, with a total maximum throughput rate of 0.45 metal waste containers per hour, consisting of the following:
- (1) Three (3) airless spray guns, with a total maximum primer usage of 2.0 gallons per metal waste container and maximum paint usage of 4.0 gallons per metal waste container, using dry filters for overspray control, and exhausting at stacks S1 and S2.
 - (2) One (1) clean-up process, with a maximum clean-up usage of 0.30 gallons per metal waste container.
 - (3) One (1) caustic metal wash process, with a maximum caustic detergent usage of 1.40 gallons per metal waste container.
 - (4) One (1) metal preparation process, with a maximum solvent usage equal to 0.37 gallons per metal waste container.
- (b) One (1) touch-up spray painting ~~booth~~ **process** using spray cans (identified as IA-1), constructed after 1990, with a maximum usage rate of 0.01 gallons of coating per hour, using dry filters for overspray control. **The touch-up spray painting is performed at the North, Middle, and South Paint Rooms, listed under painting operation (EU-01).**

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

Comment 2:

The Permittee indicated that all paints are applied "as purchased" in the painting operation (identified as EU-01), and no thinners are added before paint application. Therefore, record keeping requirements documenting the VOC content of each coating material and the amount of material used on a monthly basis (including records of purchase order, invoices and MSDS) is sufficient to document compliance with the provisions of 326 IAC 8-2-9, listed in Condition D.1.1.

Response to Comment 2:

Record keeping requirements listed in Condition D.1.6 were revised as shown.

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) ~~through (4)~~ **and (2)** below. Records maintained for (1) ~~through (4)~~ **and (2)** shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit 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, less water.
 - (2) The amount of coating material and solvent used on a 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;~~

~~(3) The monthly cleanup solvent usage; and~~

~~(4) The total VOC usage for each month.~~

...

Upon further review, IDEM, OAQ has decided to revise Condition D.1.1 as shown to correct a typographical error.

D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, for painting operations (identified as EU-01), the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallons of coating excluding water, as delivered to the applicator for extreme performance coatings.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Gal Fab, Inc.
Source Location:	612 West 11th Street, Winamac, Indiana 46996
County:	Pulaski
SIC Code:	3444
Operation Permit No.:	M131-23462-00018
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed an application from Gal Fab, Inc. relating to the operation of a stationary waste container manufacturing plant.

History

On August 3, 2006, Gal Fab, Inc. submitted an application to IDEM, OAQ requesting approval for a Minor Source State Operating Permit for an existing stationary waste container manufacturing plant located at 612 West 11th Street, Winamac, Indiana.

The Permittee was issued a FESOP No.: 131-15904-00018 on December 18, 2002, which limited the potential to emit of each single HAP to less than ten (10) and combination of HAPs to less than twenty-five (25) tons per year pursuant to the provisions of 326 IAC 2-8. On November 29, 2004, ethylene glycol monobutyl ether (EGBE, 2-Butoxyethanol), CAS Number 111-76-2 was deleted from the list of hazardous air pollutants (HAP) established by 42 U.S.C. 7412(b)(1) (see 69 FR 69325, November 29, 2004). 326 IAC 1-2-33.5 was revised effective November 20, 2005 to incorporate these amendments to 40 CFR 63, Subpart C. Most of the HAPs used at the source are EGBE, therefore, the revised potential to emit from the entire source is equal to 30.7 tons of VOC per year, 5.64 tons of single highest HAP per year, and 11.3 tons of a combination of HAPs per year. Therefore, a Minor Source Operating Permit was drafted.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Painting operations (identified as EU-01) located at North, Middle and South Paint Rooms, constructed in 1992 and modified in 1999, with a total maximum throughput rate of 0.45 metal waste containers per hour, consisting of the following:
 - (1) Three (3) airless spray guns, with a total maximum primer usage of 2.0 gallons per metal waste container and maximum paint usage of 4.0 gallons per metal waste container, using dry filters for overspray control, and exhausting at stacks S1 and S2.
 - (2) One (1) clean-up process, with a maximum clean-up usage of 0.30 gallons per metal waste container.
 - (3) One (1) caustic metal wash process, with a maximum caustic detergent usage of 1.40 gallons per metal waste container.
 - (4) One (1) metal preparation process, with a maximum solvent usage equal to 0.37 gallons per metal waste container.

- (b) One (1) touch-up spray painting booth using spray cans (identified as IA-1), constructed after 1990, with a maximum usage rate of 0.01 gallons of coating per hour, using dry filters for overspray control.
- (c) Welding and cutting operations, constructed in 1992, exhausting inside the building and consisting of the following:
 - (1) Forty-six (46) MIG welding stations, each with a maximum wire consumption rate of 1.50 pounds per hour.
 - (2) Two (2) stick welding stations, each with a maximum electrode consumption rate of 1.80 pounds per hour.
 - (3) One (1) TIG welding station, with a maximum wire consumption rate of 2.0 pounds per hour.
 - (4) Fifteen (15) oxyacetylene cutters, each with a maximum cutting rate of 20 inches per minute and the maximum thickness of the metal is 0.25 inches.
 - (5) One (1) oxypropylene cutter, with a maximum cutting rate of 40 inches per minute and the maximum thickness of the metal is 2.0 inches.
- (d) Natural gas-fired space heaters and make-up air heaters, with a combined maximum total heat input of 5.40 MMBtu per hour.
- (e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (f) Degreasing operations that do not exceed 145 gallons per 12 months, and are not subject to 326 IAC 20-6. [326 IAC 8-3]
- (g) One (1) steel machining process, including shearing, pressing and punching of cold steel, constructed in 1992, with a maximum throughput rate of 4,000 pounds of steel per hour, and exhausting into the building. The machining utilizes an aqueous coolant to continuously flood the machining interface. [326 IAC 6-3]
- (h) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

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 has been operating under FESOP No.: 131-15904-00018, issued on December 18, 2002. Upon issuance of this permit, the FESOP No.: 131-15904-00018 shall be revoked. See the history section of this TSD for details.

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.

A complete application for the purposes of this review was received on August 3, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 8).

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/year)
PM	28.5
PM10	28.6
SO ₂	0.01
VOC	30.7
CO	1.95
NO _x	2.32

HAPs	Potential to Emit (tons/year)
Benzene	4.87E-05
Dichlorobenzene	2.78E-05
Formaldehyde	1.74E-03
Hexane	4.17E-02
Toluene	3.00
Glycol Ether	5.64
Triethylamine	1.45
Xylene	0.08
Ethylbenzene	0.03
Mn	1.00
Ni	7.14E-03
Cr	1.53E-02
TOTAL	11.3

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of each criteria pollutant is less than 100 tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC, PM and PM10 is greater than 25 ton per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. A MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year.

County Attainment Status

The source is located in Pulaski County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

Note: On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana

- (a) Pulaski County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) emissions 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. Pulaski County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) Pulaski County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

Source Status

Existing 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/year)
PM	28.5
PM10	28.6
SO ₂	0.01
VOC	30.7
CO	1.95
NO _x	2.32
Single HAP	<10
Combination HAPs	<25

- (a) This existing source is not a major stationary source under PSD because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the potential to emit calculations for the source (See Appendix A, pages 1 through 8).

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing 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 second 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 for this source.
- (b) The New Source Performance Standards for Surface Coating of Metal Furniture (40 CFR Part 60.310 - 60.316, Subpart EE) are not included in the permit for this source because the surface coating operation performed at the source is applied to steel waste containers, and not metal furniture.
- (c) The New Source Performance Standards for Metal Coil Surface Coating (40 CFR Part 60.460 - 60.466, Subpart TT) are not included in the permit for this source because it is not a major source for HAP emissions.
- (d) The National Emissions Standards for Hazardous Air Pollutants (NESHAPs) for Surface Coating of Miscellaneous Metal Parts and Products (40CFR 63, Subpart Mmmm) are not included in the permit for this source because it is not a major source for HAP emissions.
- (e) The National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) are not included in the permit for this source because the materials used in the degreasing operations do not contain any halogenated HAP as specified in 40 CFR 63.460.
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR Part 61, and 40 CFR 63) included in the permit for this source.

State Rule Applicability – Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Pulaski County, is not required to operate under a Part 70 Permit, and the potential to emit of lead (Pb) is less than five (5) tons per year. Therefore, this source is not subject to annual or triennial reporting. However, pursuant to 326 IAC 2-6-1(b), this source is subject only to the additional information requests in 326 IAC 2-6-5.

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.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source was constructed in 1992 and modified in 1999. The source is not in 1 of the 28 source categories and has the potential to emit of each criteria pollutant after pollution controls

that is less than two hundred and fifty (250) tons per year. Therefore, the provisions of 326 IAC 2-2 do not apply.

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

The source was constructed in 1992 and was issued a construction permit on October 17, 1997. The source was modified in 1999. The potential to emit HAPs from the 1999 modification were less than the major source threshold of 10 tons per year for a single HAP and less than 25 tons per year for any combination of HAPs. The Permittee was issued a FESOP No.: 131-15904-00018 on December 18, 2002, which limited the potential to emit of any single HAP to less than ten (10) and combination of HAPs to less than twenty-five (25) tons per year pursuant to the provisions of 326 IAC 2-8. Therefore, the provisions of 326 IAC 2-4.1 did not apply.

On November 29, 2004, ethylene glycol monobutyl ether (EGBE, 2-Butoxyethanol), CAS Number 111-76-2 was deleted from the list of hazardous air pollutants established by 42 U.S.C. 7412(b)(1). Most of the paints used at the source contained EGBE, 2-Butoxyethanol. Therefore, the revised potential to emit from the entire source is equal to 5.64 tons of single highest HAP per year, and 11.3 tons of combination of HAPs per year. Therefore, the provisions of 326 IAC 2-4.1 do not apply.

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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to the requirements of 326 IAC 6-5 because the potential fugitive particulate matter emissions are from roads and parking lots and are less than twenty-five (25) tons per year.

State Rule Applicability - Painting Operations, Touch-up Spray Painting Booth

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

- (a) Painting operations (identified as EU-01) are subject to the provisions of 326 IAC 6-3 because this paint operation uses more than five (5) gallons of coating per day.
 - (1) Particulate from the surface coating operations shall be controlled by a dry particulate filter and the Permittee 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 Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (3) 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.
- (b) The touch-up spray booth (identified as IA-1) is exempt from the requirements of 326 IAC 6-3-2 because this spray coating operation uses less than five (5) gallons of coatings per day ($0.023 \text{ gal/unit} \times 0.45 \text{ units/hr} \times 24 \text{ hrs/day} = 0.25 \text{ gal/day}$).

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

- (a) The painting operations (EU-01) are used to paint steel waste containers and the source operates under the paint Standard Industrial Classification Code major group #34. In addition, the painting operations were constructed after July 1, 1990 and have actual VOC emissions greater than 15 pounds per day. Therefore, the painting operations are subject to 326 IAC 8-2-9 and must comply with the provisions of 326 IAC 8-2-9 as follows:
- (1) The VOC content of the coatings applied in the paint booths shall not exceed three and five tenths (3.5) pounds VOC per gallon of coating, excluding water, delivered to the applicators for application of extreme performance coatings.
 - (2) Solvent sprayed from the application equipment during clean-up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is completed, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the Permittee and the calculations made, the VOC content of the coating delivered to painting operations (identified as EU-01) are in compliance with this rule.

- (b) The touch-up painting process (identified as IA-1) applies paint to steel waste containers and was constructed after July 1, 1990. However, the actual VOC emissions from this process are less than 15 pounds per day. Therefore, the touch-up painting process is exempt from the requirements of 326 IAC 8-2-9, pursuant to 326 IAC 8-2-1(a)(4).

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

- (a) The provisions of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) applies to painting operations (identified as EU-01). Therefore, the provisions of 326 IAC 8-1-6 do not apply.
- (b) The requirements of 326 IAC 8-1-6 are not applicable to the touch-up spray painting booth, constructed or modified after January 1, 1980, the applicability date for this rule because this process does not result in the potential VOC emissions equal to greater than twenty-five (25) tons of VOCs per year and this facility would be subject to 326 IAC 8-2-9 if the actual VOC usage ever exceeds 15 pounds per day.

State Rule Applicability - Natural-Gas Fired Combustion Units

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

The natural gas-fired heating combustion units at the source are not subject to the provisions of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because according to 326 IAC 6-3-1(b)(14) manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pounds per hour are exempt from the provisions of this rule.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The natural gas-fired heating combustion units at the source are not subject to the provisions of 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) because these units are not indirect heating units.

State Rule Applicability – Welding and Cutting Processes

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

- (a) The welding process at the source consumes more than 625 pounds of rod or wire per day. However, the provisions of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) do not apply because according to 326 IAC 6-3-1(b)(14) manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pounds per hour are exempt from the provisions of this rule.

- (b) The provisions of 326 IAC 6-3-2 do not apply to the torch cutting operations at this source because pursuant to 326 IAC 6-3-1(10), torch cutting operations which cut less than 3,400 inches per hour of one (1) inch thickness stock are exempt from the provisions of 326 IAC 6-3-2.

State Rule Applicability – Petroleum Liquid Dispensing Facility

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

The Permittee is not subject to the provisions of 326 IAC 8-4-3 because the storage vessel at this source has a storage capacity less than thirty-nine thousand (39,000) gallons.

State Rule Applicability – Degreasing

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The degreaser facility was installed after July 1, 1990, performs organic solvent degreasing operations and does not have a remote reservoir. Therefore, the provisions of 326 IAC 8-3-2 and 326 IAC 8-3-5(a) and (b) are applicable to the degreasing operations at the source. The specific requirements are included in Section D.2 of the permit.

State Rule Applicability – Steel Shaping Process

326 IAC 6-3-2 (Particulate Matter Emissions for Manufacturing Processes)

The steel shaping process includes steel shearing, pressing and punching operations. Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions from the steel shaping process shall not exceed 6.52 pounds per hour when the process weight rate is 4,000 pounds per hour.

The pounds per hour limitation was calculated with 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:

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

Steel shaping includes presses, punches and shears which are listed in the permit as Item (g). There are no emissions from the presses, punches or shears as these involve physical manipulation of cold steel. The shaping operations also include lathes, mills and saws which include machining of steel where an aqueous cutting coolant continuously floods the machining interface. The machining operations are included in the permitted activities. Emissions from an aqueous cutting coolant which continuously floods the machining interface is a listed exempt activity (326 IAC 2-1.1-3(e)(10)(B)). Therefore, emissions from these operations are considered negligible.

Conclusion

The operation of this stationary waste container manufacturing plant shall be subject to the conditions of the Minor Source Operating Permit No.: M131-23462-00018.

Appendix A: Emission Calculations
VOC and PM/PM10 Emissions
Painting Operation EU-01

Company Name: Gal Fab, Inc.
Address: 612 West 11th St., Winamac, IN 46996
MSOP: 131-23462-00018
Reviewer: ERG/SD
Date: December 15, 2006

Material	Density (lbs/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Max.Throughput (unit/hr)	Max.Usage (gal/unit)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	Before		Control		After		Control	
											PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (ton/yr)	Transfer Efficiency	PM/PM10 Control Efficiency	PTE of PM/PM10 (lb/hr)	PTE of PM/PM10 (tons/yr)		
Primer MP-26E (worst case)	10.8	37.3%	22.3%	15.0%	0.45	2.00	1.62	1.46	34.9	6.37	2.13	9.33	65%	80%	0.43	1.87		
Paint MP-33 (worst case)	8.64	57.7%	37.7%	20.0%	0.45	4.00	1.73	3.11	74.6	13.6	2.31	10.10	65%	80%	0.46	2.02		
Clean-Up Solvent	7.16	100%	0.00%	100%	0.45	0.30	7.16	0.97	23.2	4.23	0.00	0.00	65%	80%	0.00	0.00		
Cleaner/Degreaser	8.68	95.0%	90.0%	5.00%	0.45	1.40	0.43	0.27	6.56	1.20	0.10	0.42	65%	80%	0.02	0.08		
VMP Naptha	6.26	100%	0.0%	100%	0.45	0.37	6.26	1.04	25.0	4.57	0.00	0.00	65%	80%	0.00	0.00		
Total								6.85		30.0	4.53	19.8			0.91	3.97		

*Assume all the PM emissions are equal to PM10 emissions.

METHODOLOGY

Pounds of VOC per Gallon Coating = Density (lb/gal) * Weight % Organics

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon of Coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon of Coating (lb/gal) * Max.Throughput (unit/hr) * Max.Usage (gal/unit) * 24 hrs/day

PTE of VOC (tons/yr) = Pounds of VOC per Gallon of Coating (lb/gal) * Max.Throughput (unit/hr) * Max.Usage (gal/unit) * 8760 hrs/yr * 1 ton/2000 lbs

PTE of PM/PM10 (lbs/hr) = Max.Throughput (unit/hr) * Max.Usage (gal/unit) * Density (lbs/gal) * (1 - Weight % Volatile) * (1-Transfer Efficiency %)

PTE of PM/PM10 (tons/yr) = Max.Throughput (unit/hr) * Max.Usage (gal/unit) * Density (lbs/gal) * (1 - Weight % Volatile) * (1-Transfer Efficiency %) * 8760 hrs/yr * 1 ton/2000 lbs

PTE of PM/PM10 (lbs/hr) = PTE of PM/PM10 (lbs/hr) * (1 - Control Efficiency %)

PTE of PM/PM10 (tons/yr) = PTE of PM/PM10 (lbs/hr) * (1 - Control Efficiency %) * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emission Calculations
HAP Emissions
Painting Operation EU-01**

Company Name: Gal Fab, Inc.
Address: 612 West 11th St., Winamac, IN 46996
MSOP: 131-23462-00018
Reviewer: ERG/SD
Date: December 15, 2006

Material	Density (lb/gal)	Max.Throughput (unit/hr)	Max. Usage (gal/unit)	Weight % Glycol Ethers	PTE of Glycol Ethers (tons/yr)	Weight % Toluene	PTE of Toluene (tons/yr)	Weight % Triethylamine	PTE of Triethylamine (tons/yr)
Primer MP-9P (worst case)	10.01	0.45	2.00	0.0%	0.00	0.0%	0.00	0.0%	0.00
Paint MP-74 (worst case)	9.36	0.45	4.00	6.0%	4.43	0.0%	0.00	0.0%	0.00
Paint MP-83 (worst case)	9.20	0.45	4.00	0.0%	0.00	0.0%	0.00	2.0%	1.45
Clean-Up Solvent	7.16	0.45	0.30	0.0%	0.00	70.0%	2.96	0.0%	0.00
Cleaner/Degreaser	8.68	0.45	1.40	5.0%	1.20	0.0%	0.00	0.0%	0.00
VMP Naptha	6.26	0.45	0.37	0.0%	0.00	0.0%	0.00	0.0%	0.00
					5.63		2.96		1.45

METHODOLOGY

PTE of HAPs (tons/yr) = Density (lb/gal) * Max.Throughput (unit/hr) * Max.Usage (gal/unit) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC and PM/PM10 Emissions
Touch-Up Spray Paint Operation (Insignificant)

Company Name: Gal Fab, Inc.
Address: 612 West 11th St., Winamac, IN 46996
MSOP: 131-23462-00018
Reviewer: ERG/SD
Date: December 15, 2006

Material	Density (lb/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Max.Throughput (unit/hr)	Max.Usage (gal/unit)	Pounds VOC per gallon of coating	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	*PTE of PM/PM10 (lb/hr)	*PTE of PM/PM10 (tons/yr)	Transfer Efficiency
Spray Black	7.97	80.0%	0.0%	80.0%	0.45	0.013	6.38	0.04	0.90	0.16	0.00	0.01	65%
Spray Red Primer	10.1	70.0%	15.0%	55.0%	0.45	0.010	5.54	0.02	0.60	0.11	0.00	0.02	65%
Total								0.06	1.49	0.27	0.01	0.04	

*Assume all the PM emissions are equal to PM10 emissions.

METHODOLOGY

Pounds of VOC per Gallon Coating = Density (lb/gal) * Weight % Organics

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon of Coating (lb/gal) * Max. Throughput (unit/hr) * Max. Usage (gal/unit)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon of Coating (lb/gal) * Max.Throughput (unit/hr) * Max.Usage (gal/unit) * 24 hrs/day

PTE of VOC (tons/yr) = Pounds of VOC per Gallon of Coating (lb/gal) * Max.Throughput (unit/hr) * Max.Usage (gal/unit) * 8760 hrs/yr * 1 ton/2000 lbs

PTE of PM/PM10 (lbs/hr) = Max.Throughput (unit/hr) * Max.Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer Efficiency %)

PTE of PM/PM10 (tons/yr) = Max.Throughput (unit/hr) * Max.Usage (gal/unit) * Density (lbs/gal) * (1- Weight % Volatile) * (1-Transfer Efficiency %) * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
HAP Emissions
Touch-Up Spray Paint Operation (Insignificant)

Company Name: Gal Fab, Inc.
Address: 612 West 11th St., Winamac, IN 46996
MSOP: 131-23462-00018
Reviewer: ERG/SD
Date: December 15, 2006

Material	Density (lb/gal)	Max.Throughput (unit/hr)	Max.Usage (gal/unit)	Weight % Glycol Ethers	PTE of Glycol Ethers (tons/yr)	Weight % Toluene	PTE of Toluene (tons/yr)	Weight % Xylene	PTE of Xylene (tons/yr)	Weight % Ethylbenzene	PTE of Ethylbenzene (tons/yr)
Spray Black	7.97	0.45	0.013	5.0%	0.01	20.0%	0.04	20.0%	4.08E-02	10.0%	0.02
Spray Red Primer	10.1	0.45	0.010	0.0%	0.00	0.0%	0.00	20.0%	3.97E-02	5.00%	0.01
					0.01		0.04		0.08		0.03

METHODOLOGY

PTE of HAPs (tons/yr) = Density (lb/gal) * Max.Throughput (unit/hr) * Max.Usage (gal/unit) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Emissions from Natural Gas Combustion
(Space Heaters and Air-Makeup Units)**

Company Name: Gal Fab, Inc.
Address: 612 West 11th St., Winamac, IN 46996
MSOP: 131-23462-00018
Reviewer: ERG/SD
Date: December 15, 2006

Heat Input Capacity
(MMBtu/hour)

Potential Throughput
(MMSCF/year)

5.40

46.4

Emission Factor (lb/MMSCF)	* PM 1.9	* PM10 7.6	SO₂ 0.6	** NO_x 100	VOC 5.5	CO 84
Potential To Emit (tons/year)	4.41E-02	1.76E-01	1.39E-02	2.32	0.13	1.95

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

** Emission factor for NO_x (Uncontrolled) = 100 lb/MMSCF.

Emission factors are from AP-42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All emission factors are based on normal firing.

METHODOLOGY

Potential Throughput (MMSCF/year) = Heat Input Capacity (MMBtu/hour) * 8760 hours/year * 1 MMSCF/1020 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMSCF/year) * Emission Factor (lb/MMSCF) * 1 ton/2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations
Emissions from Natural Gas Combustion
(Space Heaters and Air-Makeup Units)**

Company Name: Gal Fab, Inc.
Address: 612 West 11th St., Winamac, IN 46996
MSOP: 131-23462-00018
Reviewer: ERG/SD
Date: December 15, 2006

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMSCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	4.87E-05	2.78E-05	1.74E-03	4.17E-02	7.88E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor (lb/MMSCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	1.16E-05	2.55E-05	3.25E-05	8.81E-06	4.87E-05

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1.4-2, 1.4-3 and 1.4-4 (July, 1998).
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
PM and HAP Emissions
From Welding and Cutting Process**

Company Name: Gal Fab, Inc.
Address: 612 West 11th St., Winamac, IN 46996
MSOP: 131-23462-00018
Reviewer: ERG/SD
Date: December 15, 2006

Process	Number of Stations	Maximum lbs. of Electrode Consumption per hour per station	Type of wire used	Emission Factors (lb pollutant/lb electrode)				Potential To Emit (lbs/hr)			
				PM/PM10	Mn	Ni	Cr	PM/PM10	Mn	Ni	Cr
Welding:											
Metal Inert Gas (MIG)(carbon steel)	46	1.5	Lincoln L50	0.0052	0.00318	0.00001	0.00001	0.359	0.219	6.9E-04	6.9E-04
Stick	2	1.8	E1080	0.0211	0.0009			0.076	0.003	0	0.0
Tungsten Inert Gas (TIG)(carbon steel)	1	2		0.0055	0.0005			0.011	0.001	0	0.0
Cutting:											
Process	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	Emission Factors (lb pollutant/1,000 inches cut, 1" thick)				Potential To Emit (lbs/hr)			
				PM/PM10	Mn	Ni	Cr	PM/PM10	Mn	Ni	Cr
Flame Cutting:											
Oxyacetylene	15	0.25	20	0.1622	0.0005	0.0001	0.0003	0.730	0.002	4.5E-04	0.001
Oxypropylene	1	2	40	0.1622	0.0005	0.0001	0.0003	0.779	0.002	4.8E-04	0.001

PTE (lb/hr) = 1.95 0.23 1.62E-03 3.48E-03
PTE (tons/yr) = 8.56 1.00 0.01 0.02

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column, AP-42, Chapter 12.19.

METHODOLOGY

Welding emissions (lb/hr) = No. of Stations * Max. lbs of Electrode used/hour/station * Emission Factor (lb. pollutant/lb. of electrode used)

Cutting emissions (lb/hr) = No. of Stations * Max. Metal Thickness, (in.) * Max.Cutting Rate (in/min) * 60 min/hr * Emission Factor (lb. pollutant/1,000 in. cut, 1" thick)

PTE (tons/yr) = [Welding Emissions (lb/hr) + Cutting Emissions (lbs/hr)] * 8760 hrs/year * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Summary**

Company Name: Gal Fab, Inc.
Address: 612 West 11th St., Winamac, IN 46996
MSOP: 131-23462-00018
Reviewer: ERG/SD
Date: December 15, 2006

Emission Units/Processes	Potential to Emit (tons per year)					
	PM	PM10	SO ₂	NO _x	VOC	CO
Paint Operations	19.8	19.8	0.00	0.00	30.0	0.00
Touch-up Spray Booth	0.04	0.04	0.00	0.00	0.27	0.00
Natural Gas-Fired Units	4.41E-02	1.76E-01	1.39E-02	2.32	0.13	1.95
Welding	8.56	8.56	0.00	0.00	0.29	0.00
TOTAL	28.5	28.6	0.01	2.32	30.7	1.95

HAPs	PTE (tpy)
Benzene	4.87E-05
Dichlorobenzene	2.78E-05
Formaldehyde	1.74E-03
Hexane	4.17E-02
Toluene	3.00
Glycol Ether	5.64
Triethylamine	1.45
Xylene	0.08
Ethylbenzene	0.03
Mn	1.00
Ni	7.14E-03
Cr	1.53E-02
TOTAL	11.3