



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: February 16, 2007
RE: DuBose Manufacturing, Inc. / 107-23528-00063
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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**NEW SOURCE REVIEW AND
MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY**

**Dubose Manufacturing, Inc.
4414 East 400 South
Crawfordsville, Indiana 47933**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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

Operation Permit No.: 107-23528-00063	
Issued by: Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: February 16, 2007 Expiration Date: February 16, 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 metal strapping manufacturing operation

Source Address:	4414 East 400 South, Crawfordsville, Indiana 47933
Mailing Address:	7379 Beechwood Road, Derby, New York, 14047
General Source Phone Number:	716-481-5743
SIC Code:	3479
County Location:	Montgomery
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One heat treatment process, identified as HT3 oil, for the removal of a corrosion-protective oil coating, with a maximum capacity of 5.6 tons per hour of coated steel coils, heated by a natural gas-fired burner, with a maximum capacity of 1.5 MMBtu per hour, approved for construction in 2007. Emissions are controlled by the regeneration thermal oxidizer (RTO).
- (b) One electric induction oven, identified as SP4 oil, for the removal of a corrosion-protective oil coating, with a maximum capacity of 5.6 tons per hour of steel strapping, approved for construction in 2007. Emissions are controlled by the regeneration thermal oxidizer (RTO).
- (c) One slitter and deburring operation, with a maximum capacity of 5.6 tons per hour of oil coated regular duty steel coils, approved for construction in 2007.
- (d) One dip tank, identified as the SP4 E-coat dip tank, for the application of coating to steel strapping, with a maximum capacity of 5.6 tons per hour steel strapping, with an electric induction furnace for curing the coating, approved for construction in 2007. Emissions are controlled by the regeneration thermal oxidizer (RTO). Under 40 CFR 60, Subpart TT, the dip tank is considered a new metal coil coating operation.
- (e) One wax coating operation, identified as SP4Wax, with a maximum wax usage of 3.9 gallons per hour, for the coating of steel strapping prior to shipping, approved for construction in 2007.
- (f) One (1) 9,000 cfm regenerative thermal oxidizer, identified as RT01, with a 3.0 MMBtu per hour natural gas-fired burner, for control of emissions from the heat treatment process HT3 oil, the induction oven SP4 oil, and the SP4 E-coat dip tank, approved for construction in 2007.

These units operate under two different operating scenarios to comply with 326 IAC 8-2-4 and 40 CFR 60, Subpart TT. Alternative Operating Scenario No. 1 consists of operating the thermal oxidizer when the metal coil coating lines are operating. Alternative Operating Scenario No. 2 consists of utilizing daily volume weighted averaging when the oxidizer is not operating.

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 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 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, 107-23528-00063, 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.5 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.6 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.7 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.8 Property Rights or Exclusive Privilege

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

B.9 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.10 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.11 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue,
Indianapolis, 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.12 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.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 107-23528-00063 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.14 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.15 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.16 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.17 Source Modification Requirement

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

B.18 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under 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.19 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by 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.20 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.21 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 construct and 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) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. 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 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Instrument Specifications [326 IAC 2-1.1-11]

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

Corrective Actions and Response Steps

C.13 Response to Excursions or Exceedances

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.14 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 facility 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 retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.15 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.16 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.17 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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One heat treatment process, identified as HT3 oil, for the removal of a corrosion-protective oil coating, with a maximum capacity of 5.6 tons per hour of coated steel coils, heated by a natural gas-fired burner, with a maximum capacity of 1.5 MMBtu per hour, approved for construction in 2007. Emissions are controlled by the regeneration thermal oxidizer (RTO).
- (b) One electric induction oven, identified as SP4 oil, for the removal of a corrosion-protective oil coating, with a maximum capacity of 5.6 tons per hour of steel strapping, approved for construction in 2007. Emissions are controlled by the regeneration thermal oxidizer (RTO).
- (c) One slitter and deburring operation, with a maximum capacity of 5.6 tons per hour of oil coated regular duty steel coils, approved for construction in 2007.
- (d) One dip tank, identified as the SP4 E-coat dip tank, for the application of coating to steel strapping, with a maximum capacity of 5.6 tons per hour steel strapping, with an electric induction furnace for curing the coating, approved for construction in 2007. Emissions are controlled by the regeneration thermal oxidizer (RTO). Under 40 CFR 60, Subpart TT, the dip tank is considered a new metal coil coating operation.
- (e) One wax coating operation, identified as SP4Wax, with a maximum wax usage of 3.9 gallons per hour, for the coating of steel strapping prior to shipping, approved for construction in 2007.
- (f) One (1) 9,000 cfm regenerative thermal oxidizer, identified as RT01, with a 3.0 MMBtu per hour natural gas-fired burner, for control of emissions from the heat treatment process HT3 oil, the induction oven SP4 oil, and the SP4 E-coat dip tank, approved for construction in 2007.

These units operate under two different operating scenarios to comply with 326 IAC 8-2-4 and 40 CFR 60, Subpart TT. Alternative Operating Scenario No. 1 consists of operating the thermal oxidizer when the metal coil coating lines are operating. Alternative Operating Scenario No. 2 consists of utilizing daily volume weighted averaging when the oxidizer is not operating.

(The information describing the process contained in this emissions unit 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 8-2-4]

- (a) Pursuant to 326 IAC 8-2-4, the Permittee shall not allow the discharge into the atmosphere VOC in excess of two and six-tenth (2.6) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator from the E-coat dip tank.
- (b) Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the E-coat dip tank shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where

- L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
- D = Density of VOC in coating in pounds per gallon of VOC;
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

- (c) The pounds of VOC per gallon of coating solids shall be limited to less than 4.75.
- (d) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the thermal oxidizer shall be greater than 17.2% .

D.1.2 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 heat treat process HT3 and the induction oven SP4 shall not exceed 13.0 pounds per hour when operating at a process weight rate of 11,200 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

Compliance Determination Requirements

D.1.3 VOC Control

In order to comply with Condition D.1.1, when operating under Alternative Operating Scenario No. 1, the Permittee shall operate the thermal oxidizer at all times the metal coil coating lines are in operation to achieve compliance with D.1.1.

D.1.4 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

- (a) When operating under Alternative Operating Scenario No. 2, 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.
- (b) When operating under Alternative Operating Scenario No. 2, compliance with the VOC content limit in *Condition* D.1.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (c) \times U] / \sum U$$

- Where:
- A is the volume weighted average in pounds VOC per gallon less water as applied;
 - C is the VOC content of the coating in pounds VOC per gallon less water as applied; and
 - U is the usage rate of the coating in gallons per day

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after initial startup but no later than 60 days after reaching maximum capacity, the Permittee shall conduct a performance test to verify compliance with the VOC control efficiency in Condition D.1.1 for the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

D.1.6 Thermal Oxidizer Temperature

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C – Excursions and Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below 1400°F. A 3-hour average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C – Excursions and Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.1.1, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C – Excursions and Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C – Excursions and Exceedances shall be considered a deviation from this permit.

D.1.7 Parametric Monitoring

- (a) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in condition D.1.1, as approved by IDEM.
- (b) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C – Excursions and Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C – Excursions and Exceedances shall be considered a deviation from this permit.

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

D.1.8 Record Keeping Requirements

- (a) To document compliance with condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC limit established in condition D.1.1.
 - (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;
 - (4) The total VOC usage for each month; and
- (b) To document compliance with Condition D.1.6, maintain continuous temperature records (on a 3-hour average basis) for the thermal oxidizer and the 3-hour average temperature used to demonstrate compliance during the most recent compliant stack test or maintain a record of the reason why the continuous temperature records were not taken.
- (c) To document compliance with Condition D.1.7, maintain daily records of the duct pressure or fan amperage or maintain a record of why the dust pressure or fan amperage were not taken.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

New Source Performance Standards (NSPS) Requirements: for Metal Coil Coating Operations

D.1.9 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the metal coil coating operation described in this section, except when otherwise specified in 40 CFR Part 60, Subpart TT.

D.1.10 NSPS for Metal Coil Surface Coating Requirements [40 CFR Part 60.460, Subpart TT]

Pursuant to CFR Part 60, Subpart TT, the Permittee shall comply with the provisions of 40 CFR Part 60.460, for the metal coil coating operation, as specified below.

Subpart TT—Standards of Performance for Metal Coil Surface Coating

Source: 47 FR 49612, Nov. 1, 1982, unless otherwise noted.

§ 60.460 Applicability and designation of affected facility.

(a) The provisions of this subpart apply to the following affected facilities in a metal coil surface coating operation: each prime coat operation, each finish coat operation, and each prime and finish coat operation combined when the finish coat is applied wet on wet over the prime coat and both coatings are cured simultaneously.

(b) This subpart applies to any facility identified in paragraph (a) of this section that commences construction, modification, or reconstruction after January 5, 1981.

§ 60.461 Definitions.

(a) All terms used in this subpart not defined below are given the same meaning as in the Act or in subpart A of this part.

Coating means any organic material that is applied to the surface of metal coil.

Coating application station means that portion of the metal coil surface coating operation where the coating is applied to the surface of the metal coil. Included, as part of the coating application station, is the flashoff area between the coating application station and the curing oven.

Curing oven means the device that uses heat or radiation to dry or cure the coating applied to the metal coil.

Finish coat operation means the coating application station, curing oven, and quench station used to apply and dry or cure the final coating(s) on the surface of the metal coil. Where only a single coating is applied to the metal coil, that coating is considered a finish coat.

Metal coil surface coating operation means the application system used to apply an organic coating to the surface of any continuous metal strip with thickness of 0.15 millimeter (mm) (0.006 in.) or more that is packaged in a roll or coil.

Prime coat operation means the coating application station, curing oven, and quench station used to apply and dry or cure the initial coating(s) on the surface of the metal coil.

Quench station means that portion of the metal coil surface coating operation where the coated metal coil is cooled, usually by a water spray, after baking or curing.

VOC content means the quantity, in kilograms per liter of coating solids, of volatile organic compounds (VOC's) in a coating.

(b) All symbols used in this subpart not defined below are given the same meaning as in the Act and in subpart A of this part.

C_a = the VOC concentration in each gas stream leaving the control device and entering the atmosphere (parts per million by volume, as carbon).

C_b = the VOC concentration in each gas stream entering the control device (parts per million by volume, as carbon).

C_f = the VOC concentration in each gas stream emitted directly to the atmosphere (parts per million by volume, as carbon).

D_c = density of each coating, as received (kilograms per liter).

D_d = density of each VOC-solvent added to coatings (kilograms per liter).

D_r = density of VOC-solvent recovered by an emission control device (kilograms per liter).

E = VOC destruction efficiency of the control device (fraction).

F = the proportion of total VOC's emitted by an affected facility that enters the control device (fraction).

G = volume-weighted average mass of VOC's in coatings consumed in a calendar month per unit volume of coating solids applied (kilograms per liter).

L_c = the volume of each coating consumed, as received (liters).

L_d = the volume of each VOC-solvent added to coatings (liters).

L_r = the volume of VOC-solvent recovered by an emission control device (liters).

L_s = the volume of coating solids consumed (liters).

M_d = the mass of VOC-solvent added to coatings (kilograms).

M_o = the mass of VOC's in coatings consumed, as received (kilograms).

M_r = the mass of VOC's recovered by an emission control device (kilograms).

N = the volume-weighted average mass of VOC emissions to the atmosphere per unit volume of coating solids applied (kilograms per liter).

Q_a = the volumetric flow rate of each gas stream leaving the control device and entering the atmosphere (dry standard cubic meters per hour).

Q_b = the volumetric flow rate of each gas stream entering the control device (dry standard cubic meters per hour).

Q_f = the volumetric flow rate of each gas stream emitted directly to the atmosphere (dry standard cubic meters per hour).

R = the overall VOC emission reduction achieved for an affected facility (fraction).

S = the calculated monthly allowable emission limit (kilograms of VOC per liter of coating solids applied).

V_s = the proportion of solids in each coating, as received (fraction by volume).

W_o = the proportion of VOC's in each coating, as received (fraction by weight).

§ 60.462 Standards for volatile organic compounds.

(a) On and after the date on which §60.8 requires a performance test to be completed, each owner or operator subject to this subpart shall not cause to be discharged into the atmosphere more than:

(1) 0.28 kilogram VOC per liter (kg VOC/l) of coating solids applied for each calendar month for each affected facility that does not use an emission control device(s); or

(2) 0.14 kg VOC/l of coating solids applied for each calendar month for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency; or

§ 60.463 Performance test and compliance provisions.

(a) Section 60.8(d) and (f) do not apply to the performance test.

(b) The owner or operator of an affected facility shall conduct an initial performance test as required under §60.8(a) and thereafter a performance test for each calendar month for each affected facility according to the procedures in this section.

(c) The owner or operator shall use the following procedures for determining monthly volume-weighted average emissions of VOC's in kg/l of coating solids applied.

(1) An owner or operator shall use the following procedures for each affected facility that does not use a capture system and control device to comply with the emission limit specified under §60.462(a)(1). The owner or operator shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24. The Administrator may require the owner or operator who uses formulation data supplied by the manufacturer of the coatings to determine the VOC content of coatings using Method 24 or an equivalent or alternative method. The owner or operator shall determine the volume of coating and the mass of VOC-solvent added to coatings from company records on a monthly basis. If a common coating distribution system serves more than one affected facility or serves both affected and existing facilities, the owner or operator shall estimate the volume of coating used at each affected facility by using the average dry weight of coating and the surface area coated by each affected and existing facility or by other procedures acceptable to the Administrator.

(i) Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied during each calendar month for each affected facility, except as provided under paragraph (c)(1)(iv) of this section. The weighted average of the total mass of VOC's used per unit volume of coating solids applied each calendar month is determined by the following procedures.

(A) Calculate the mass of VOC's used ($M_o + M_d$) during each calendar month for each affected facility by the following equation:

$$M_o + M_d = \sum_{i=1}^n L_{oi} D_{oi} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj} \quad \text{Equation 1}$$

($\sum L_{dj}D_{dj}$ will be 0 if no VOC solvent is added to the coatings, as received)

where

n is the number of different coatings used during the calendar month, and

m is the number of different VOC solvents added to coatings used during the calendar month.

(B) Calculate the total volume of coating solids used (L_s) in each calendar month for each affected facility by the following equation:

$$L_s = \sum_{i=1}^n V_{si} L_{tsi} \quad \text{Equation 2}$$

Where:

n is the number of different coatings used during the calendar month.

(C) Calculate the volume-weighted average mass of VOC's used per unit volume of coating solids applied (G) during the calendar month for each affected facility by the following equation:

$$G = \frac{M_o + M_d}{L_s} \quad \text{Equation 3}$$

(ii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during the calendar month for each affected facility by the following equation:

$$N = G \quad \text{Equation 4}$$

(iii) Where the volume-weighted average mass of VOC's discharged to the atmosphere per unit volume of coating solids applied (N) is equal to or less than 0.28 kg/l, the affected facility is in compliance.

(iv) If each individual coating used by an affected facility has a VOC content, as received, that is equal to or less than 0.28 kg/l of coating solids, the affected facility is in compliance provided no VOC's are added to the coatings during distribution or application.

(2) An owner or operator shall use the following procedures for each affected facility that continuously uses a capture system and a control device that destroys VOC's (e.g., incinerator) to comply with the emission limit specified under §60.462(a) (2) or (3).

(i) Determine the overall reduction efficiency (R) for the capture system and control device.

For the initial performance test, the overall reduction efficiency (R) shall be determined as prescribed in paragraphs (c)(2)(i) (A), (B), and (C) of this section. In subsequent months, the owner or operator may use the most recently determined overall reduction efficiency (R) for the performance test, providing control device and capture system operating conditions have not changed. The procedure in paragraphs (c)(2)(i) (A), (B), and (C) of this section, shall be repeated when directed by the Administrator or when the owner or operator elects to operate the control device or capture system at conditions different from the initial performance test.

(A) Determine the fraction (F) of total VOC's emitted by an affected facility that enters the control device using the following equation:

$$F = \frac{\sum_{i=1}^l C_{vi} Q_{vi}}{\sum_{i=1}^l C_{vi} Q_{vi} + \sum_{i=1}^l C_{ni} Q_{ni}} \quad \text{Equation 5}$$

Where:

l is the number of gas streams entering the control device, and

p is the number of gas streams emitted directly to the atmosphere.

(B) Determine the destruction efficiency of the control device (E) using values of the volumetric flow rate of each of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by the following equation:

$$E = \frac{\sum_{i=1}^n Q_{vi}C_{vi} - \sum_{j=1}^m Q_{vj}C_{vj}}{\sum_{i=1}^n Q_{vi}C_{vi}} \quad \text{Equation 6}$$

Where:

n is the number of gas streams entering the control device, and

m is the number of gas streams leaving the control device and entering the atmosphere.

The owner or operator of the affected facility shall construct the VOC emission reduction system so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures specified in §60.466. The owner or operator of the affected facility shall construct a temporary enclosure around the coating applicator and flashoff area during the performance test for the purpose of evaluating the capture efficiency of the system. The enclosure must be maintained at a negative pressure to ensure that all VOC emissions are measurable. If a permanent enclosure exists in the affected facility prior to the performance test and the Administrator is satisfied that the enclosure is adequately containing VOC emissions, no additional enclosure is required for the performance test.

(C) Determine overall reduction efficiency (R) using the following equation:

$$R = EF \quad \text{Equation 7}$$

If the overall reduction efficiency (R) is equal to or greater than 0.90, the affected facility is in compliance and no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) shall be computed as follows.

(ii) Calculate the volume-weighted average of the total mass of VOC's per unit volume of coating solids applied (G) during each calendar month for each affected facility using equations in paragraphs (c)(1)(i) (A), (B), and (C) of this section.

(iii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month by the following equation:

$$N = G(1 - R) \quad \text{Equation 8}$$

(iv) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/l of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test.

[47 FR 49612, Nov. 1, 1982; 48 FR 1056, Jan. 10, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.464 Monitoring of emissions and operations.

(a) Where compliance with the numerical limit specified in §60.462(a) (1) or (2) is achieved through the use of low VOC-content coatings without the use of emission control devices or through the use of higher VOC-content coatings in conjunction with emission control devices, the owner or operator shall compute and record the average VOC content of coatings applied during each calendar month for each affected facility, according to the equations provided in §60.463.

(c) If thermal incineration is used, each owner or operator subject to the provisions of this subpart shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with §60.462(a)(2), (3), or (4). This device shall have an accuracy of ± 2.5 °C. or ± 0.75 percent of the temperature being measured expressed in degrees

Celsius, whichever is greater. Each owner or operator shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28 °C (50 °F) below the temperature at which compliance with §60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by §60.8. The records required by §60.7 shall identify each such occurrence and its duration. If catalytic incineration is used, the owner or operator shall install, calibrate, operate, and maintain a device to monitor and record continuously the gas temperature both upstream and downstream of the incinerator catalyst bed. This device shall have an accuracy of ± 2.5 °C. or ± 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. During coating operations, the owner or operator shall record all periods in excess of 3 hours where the average difference between the temperature upstream and downstream of the incinerator catalyst bed remains below 80 percent of the temperature difference at which compliance was demonstrated during the most recent measurement of incinerator efficiency or when the inlet temperature falls more than 28 °C (50 °F) below the temperature at which compliance with §60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by §60.8. The records required by §60.7 shall identify each such occurrence and its duration.

[47 FR 49612, Nov. 1, 1982; 48 FR 1056, Jan. 10, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.465 Reporting and recordkeeping requirements.

(a) Where compliance with the numerical limit specified in §60.462(a) (1), (2), or (4) is achieved through the use of low VOC-content coatings without emission control devices or through the use of higher VOC-content coatings in conjunction with emission control devices, each owner or operator subject to the provisions of this subpart shall include in the initial compliance report required by §60.8 the weighted average of the VOC content of coatings used during a period of one calendar month for each affected facility. Where compliance with §60.462(a)(4) is achieved through the intermittent use of a control device, reports shall include separate values of the weighted average VOC content of coatings used with and without the control device in operation.

(b) Where compliance with §60.462(a)(2), (3), or (4) is achieved through the use of an emission control device that destroys VOC's, each owner or operator subject to the provisions of this subpart shall include the following data in the initial compliance report required by §60.8:

(1) The overall VOC destruction rate used to attain compliance with §60.462(a)(2), (3), or (4) and the calculated emission limit used to attain compliance with §60.462(a)(4); and

(2) The combustion temperature of the thermal incinerator or the gas temperature, both upstream and downstream of the incinerator catalyst bed, used to attain compliance with §60.462(a)(2), (3), or (4).

(c) Following the initial performance test, the owner or operator of an affected facility shall identify, record, and submit a written report to the Administrator every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under §60.462. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.

(d) The owner or operator of each affected facility shall also submit reports at the frequency specified in §60.7(c) when the incinerator temperature drops as defined under §60.464(c). If no such periods occur, the owner or operator shall state this in the report.

(e) Each owner or operator subject to the provisions of this subpart shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain, at the source, daily records of the incinerator combustion temperature. If catalytic incineration is used, the owner or operator shall maintain at the source daily records of the gas temperature, both upstream and downstream of the incinerator catalyst bed.

[47 FR 49612, Nov. 1, 1982, as amended at 55 FR 51383, Dec. 13, 1990; 56 FR 20497, May 3, 1991; 65 FR 61761, Oct. 17, 2000]

§ 60.466 Test methods and procedures.

(a) The reference methods in appendix A to this part, except as provided under §60.8(b), shall be used to determine compliance with §60.462 as follows:

(1) Method 24, or data provided by the formulator of the coating, shall be used for determining the VOC content of each coating as applied to the surface of the metal coil. In the event of a dispute, Method 24 shall be the reference method. When VOC content of waterborne coatings, determined by Method 24, is used to determine compliance of affected facilities, the results of the Method 24 analysis shall be adjusted as described in Section 12.6 of Method 24;

(2) Method 25, both for measuring the VOC concentration in each gas stream entering and leaving the control device on each stack equipped with an emission control device and for measuring the VOC concentration in each gas stream emitted directly to the atmosphere;

(3) Method 1 for sample and velocity traverses;

(4) Method 2 for velocity and volumetric flow rate;

(5) Method 3 for gas analysis; and

(6) Method 4 for stack gas moisture.

(b) For Method 24, the coating sample must be at least a 1-liter sample taken at a point where the sample will be representative of the coating as applied to the surface of the metal coil.

(c) For Method 25, the sampling time for each of three runs is to be at least 60 minutes, and the minimum sampling volume is to be at least 0.003 dscm (0.11 dscf); however, shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Administrator.

(d) The Administrator will approve testing of representative stacks on a case-by-case basis if the owner or operator can demonstrate to the satisfaction of the Administrator that testing of representative stacks yields results comparable to those that would be obtained by testing all stacks.

[47 FR 49612, Nov. 1, 1982, as amended at 51 FR 22938, June 24, 1986; 65 FR 61761, Oct. 17, 2000]

D.1.11 One Time Deadlines Relating to NSPS for Metal Coil Surface Coating [40 CFR Part 60, Subpart TT]

-
- (a) The Permittee must provide a notification of the date construction of an affected facility is commenced postmarked no later than 30 days after such date.
 - (b) The Permittee must provide a notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.
 - (c) The Permittee must conduct the initial performance test and submit a compliance status report for RTO1 within 60 days after achieving the maximum production rate at which the RTO will be operated, but not later than 180 days after initial startup.

**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:	Dubose Manufacturing, Inc.
Address:	4414 East 400 South
City:	Crawfordsville, Indiana 47933
Phone #:	716-481-5743
MSOP #:	107-23528-00063

I hereby certify that Dubose Manufacturing, Inc. is : still in operation.
 no longer in operation.
I hereby certify that Dubose Manufacturing, Inc. is : in compliance with the requirements of MSOP
107-23528-00063.
 not in compliance with the requirements of
MSOP 107-23528-00063.

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:

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Dubose Manufacturing, Inc.
7379 Beechwood Road
Derby, New York, 14047

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____, I have personal
(Company Name)

knowledge of the representations contained in this affidavit and am authorized to make

these representations on behalf of _____.
(Company Name)

4. I hereby certify that Dubose Manufacturing, Inc., 4414 East 400 South, Crawfordsville, Indiana 47933, completed construction of the metal strapping manufacturing operation on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on August 17, 2006, and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. CP107-23528-00063, Plant ID No. 107-00063 issued on _____.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____

Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 20 _____.

My Commission expires:

Signature _____

Name (typed or printed)

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

**Addendum to the Technical Support Document
for New Source Review and a Minor Source Operating Permit**

Source Background and Description

Source Name:	Dubose Manufacturing, Inc.
Source Location:	4414 East 400 South, Crawfordsville, Indiana 47933
County:	Montgomery
SIC Code:	3479
Operation Permit No.:	M107-23528-00063
Permit Reviewer:	ERG/TDP

On January 13, 2007 the Office of Air Quality (OAQ) had a notice published in the Journal Review of Crawfordsville, Indiana, stating that Dubose Manufacturing, Inc. had applied for a New Source Review and Minor Source Operating Permit to operate a stationary metal strapping manufacturing operation with control. 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.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. IDEM, OAQ has decided to remove the information regarding the Authorized Individual from Section A.1 of the permit. Listing the name and/or title in the permit has resulted in unnecessary administrative amendments and notice-only changes in the past. Therefore, IDEM, OAQ does not consider it beneficial to maintain or update this information in the permits. IDEM, OAQ will continue to retain this information up-to-date in their permit tracking system.

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates stationary metal strapping manufacturing operation

Authorized Individual: _____ Vice President

...

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name:	Dubose Manufacturing, Inc.
Source Location:	4414 East 400 South, Crawfordsville, Indiana 47933
County:	Montgomery
SIC Code:	3479
Operation Permit No.:	M107-23528-00063
Permit Reviewer:	ERG/TDP

The Office of Air Quality (OAQ) has reviewed a renewal application from Dubose Manufacturing, Inc. relating to the operation of a stationary metal strapping manufacturing operation.

New Emission Units and Pollution Control Equipment

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

- (a) One heat treatment process, identified as HT3 oil, for the removal of a corrosion-protective oil coating, with a maximum capacity of 5.6 tons per hour of coated steel coils, heated by a natural gas-fired burner, with a maximum capacity of 1.5 MMBtu per hour, approved for construction in 2007. Emissions are controlled by the regeneration thermal oxidizer (RTO).
- (b) One electric induction oven, identified as SP4 oil, for the removal of a corrosion-protective oil coating, with a maximum capacity of 5.6 tons per hour of steel strapping, approved for construction in 2007. Emissions are controlled by the regeneration thermal oxidizer (RTO).
- (c) One slitter and deburring operation, with a maximum capacity of 5.6 tons per hour of oil coated regular duty steel coils, approved for construction in 2007.
- (d) One dip tank, identified as the SP4 E-coat dip tank, for the application of coating to steel strapping, with a maximum capacity of 5.6 tons per hour steel strapping, with an electric induction furnace for curing the coating, approved for construction in 2007. Emissions are controlled by the regeneration thermal oxidizer (RTO). Under 40 CFR 60, Subpart TT, the dip tank is considered a new metal coil coating operation.
- (e) One wax coating operation, identified as SP4Wax, with a maximum wax usage of 3.9 gallons per hour, for the coating of steel strapping prior to shipping, approved for construction in 2007.
- (f) One (1) 9,000 cfm regenerative thermal oxidizer, identified as RT01, with a 3.0 MMBtu per hour natural gas-fired burner, for control of emissions from the heat treatment process HT3 oil, the induction oven SP4 oil, and the SP4 E-coat dip tank, approved for construction in 2007.

These units operate under two different operating scenarios to comply with 326 IAC 8-2-4 and 40 CFR 60, Subpart TT. Alternative Operating Scenario No. 1 consists of operating the thermal oxidizer when the metal coil coating lines are operating. Alternative Operating Scenario No. 2 consists of utilizing daily volume weighted averaging when the oxidizer is not operating.

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 previous approvals issued to this source.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
RTO1	E-coat diptank, HT3 oil, and SP4 oil	61.3	1.5	9,000	1500

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.

A complete application for the purposes of this review was received on August 17, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 5).

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	15.4
PM10	15.4
SO ₂	0.004
VOC	56.4
CO	0.54
NO _x	0.64

HAPs	Potential to Emit (tons/year)
1,2, 4 Trimethyl benzene	7.2
Trimethylamine	7.2
Formaldehyde	0.1
Total	15.1

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants are less than 100 tons per year and the potential to emit of VOC is greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (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. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) do not apply.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Montgomery 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) Montgomery 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. Montgomery 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) Montgomery County has been classified as attainment or unclassifiable in Indiana for PM10, Pb, CO, NO₂, and SO₂. 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.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

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

Pollutant	Emissions (tons/year)
PM	0.30
PM10	0.30
SO ₂	0.004
VOC	1.75
CO	0.54
NO _x	0.64
Single HAP	0.14
Combination HAPs	0.30

This new source is not a major stationary source under PSD because no attainment 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. Therefore, pursuant to 326 IAC 2-2, the PSD 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) The metal coil coating operation is subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.460), Subpart TT, because the facility commenced construction after January 5, 1981, the applicability date for this rule, and is a metal coil coating operation.

The metal coil coating operation is subject to the following sections of 40 CFR 60, Subpart TT. Non-applicable portions of the NSPS are not included in the permit.

- (1) 40 CFR 60.460
- (2) 40 CFR 60.461
- (3) 40 CFR 60.462(a)(1),(a)(2)
- (4) 40 CFR 60.463(a),(b),(c)(1),(c)(2)
- (5) 40 CFR 60.464(a),(c)
- (6) 40 CFR 60.465(a),(b),(c),(d),(e)
- (7) 40 CFR 60.466

The provisions of 40 CFR 60, Subpart A – General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the metal coil coating operation except when otherwise specified in 40 CFR 60, Subpart TT.

- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) applicable to this source.

- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart SSSS, 40 CFR 63.5080 are not included in this permit because this metal coil surface coating operation is not a major source of HAP.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source, approved to construct in 2007, is not subject to the requirements of 326 IAC 2-2 because the potential to emit of all criteria pollutants is less than 250 tons per year. Therefore, this source is a minor source under PSD.

326 IAC 2-6 (Emission Reporting)

This source is located in Montgomery County, is not required to operate under a Part 70 permit, and emits less than five (5) tons per year of lead. Therefore, pursuant to 326 IAC 2-6-1(b), the source is only subject to additional information requests as provided 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 6-4 (Fugitive Dust)

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

326 IAC 6-5 (Particulate Matter Limitations Except Lake County)

This source is not subject to 326 IAC 6-5 (Particulate Matter Limitations Except Lake County) because the fugitive particulate matter emissions from this source are negligible.

State Rule Applicability – E-Coat Dip Tank

326 IAC 2-4.1 (Hazardous Air Pollutants)

The operation of this stationary metal strapping manufacturing operation will emit less than 10 tons per year of a single HAP and less than 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)

The E-coat dip tank, for application of coatings to steel strappings, is not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because the coating application is a dip coating process. Therefore, the dip tank is exempt pursuant to 326 IAC 6-3-1(b)(5).

326 IAC 8-1-6 (New facilities; general reduction requirements)

The E-coat dip tank is not subject to 326 IAC 8-1-6 (New facilities; general reduction requirements) because the facility is subject to 326 IAC 8-2-4 (Coil Coating Operations).

326 IAC 8-2-4 (Coil Coating Operations)

The E-coat dip tank is subject to the provisions of 326 IAC 8-2-4 (Coil Coating Operations) because the operation coats metal strips that come in rolls or coils, will be constructed after July

1, 1990, and has actual VOC emissions greater than fifteen (15) pounds per day. Pursuant to 326 IAC 8-2-4, the Permittee shall not allow the discharge into the atmosphere VOC in excess of two and six-tenths (2.6) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator. The facility will comply with this limit utilizing daily weighted averaging or the RTO. Pursuant to 326 IAC 8-1-2 (b), the VOC emissions from the E-coat dip tank shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids.

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where

- L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating (2.6 lb VOC/gal);
- D = Density of VOC in coating in pounds per gallon of VOC;
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2 (a).

The pounds of VOC per gallon of coating solids shall be limited to less than 4.75.

Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the thermal oxidizer shall be greater than 17.2%.

State Rule Applicability – Heat Treatment Process (HT3) and Induction Oven (SP4)

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

The heat treatment process, identified as HT3, and the induction oven, identified as SP4, for the removal of oil coatings from metal coils, are subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes).

The slitter and deburring operation is not subject to the requirements of 326 IAC 6-3-2 because there are no particulate emissions from this process. The operation utilizes a knife-like cutter to cut metal strap into 1/2" strips.

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the heat treat process HT3 and the induction oven SP4 shall not exceed 13.0 pounds per hour when operating at a process weight rate of 11,200 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:

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

326 IAC 8-1-6 (New facilities; general reduction requirements)

The heat treatment process, identified as HT3, and the induction oven, identified as SP4, to be constructed in 2006, for the removal of oil coatings from metal coils, are not subject to 326 IAC 8-1-6 (New facilities; general reduction requirements) because the potential to emit VOC from each facility is less than twenty-five (25) tons per year.

State Rule Applicability – Wax Coating Operation (SPWax)

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

The wax coating operation, identified as SPWax, for the application of wax coatings to steel strapping, is not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because this manufacturing process has a potential to emit of particulate matter less than five hundred fifty-one thousandths (0.551) pound per hour. Therefore, the wax coating operation SPWax is exempt pursuant to 326 IAC 6-3-1(b)(14).

326 IAC 8-2-4 (Coil Coating)

The wax coating operation, identified as SPWax, is not subject to the requirements of 326 IAC 8-2-4 (Coil Coating), because the facility has potential VOC emissions, and therefore actual VOC emissions, less than fifteen (15) pounds per day.

State Rule Applicability – One (1) 3.0 MMBtu Natural Gas Fired Burner

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

The natural gas fired burner, identified as HT3Comb is not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Sources of Indirect Heating) because the burner is not a source of indirect heating.

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

The natural gas-fired burner, identified as HT3Comb, is not subject to the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because a this unit has a potential to emit of particulate matter less than five hundred fifty-one thousandths (0.551) pound per hour. Therefore, the natural gas-fired burner HT3Comb is exempt per 326 IAC 6-3-1(b)(14).

Testing Requirements

Testing is required for the regenerative thermal oxidizer RTO1. The Permittee shall conduct a stack test on RTO1, using methods approved by the Commissioner, within 180 days after start-up. This testing shall be repeated once every five years. Testing is necessary to verify that the VOC emissions from this unit do not exceed the limits of 326 IAC 8-2-4 (Coil Coating Operations) and 40 CFR 60, Subpart TT, in Conditions D.1.1 and D.1.9.

Compliance Requirements

Permits issued under 326 IAC 2-6.1 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-6.1-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The compliance monitoring requirements applicable to this source are as follows:

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. The output of this system shall be recorded as a 3-hour average. From the date of issuance of this permit until the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C – Excursions and Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below 1400°F. A 3-hour average temperature that is below 1400°F is not a deviation from this permit. Failure to take response steps in accordance with Section C – Excursions and Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in condition D.1.1, as approved by IDEM.
- (c) On and after the date the approved stack test results are available, the Permittee shall take appropriate response steps in accordance with Section C – Excursions and Exceedances whenever the 3-hour average temperature of the thermal oxidizer is below the 3-hour average temperature as observed during the compliant stack test. A 3-hour average temperature that is below the 3-hour average temperature as observed during the compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C – Excursions and Exceedances shall be considered a deviation from this permit.
- (d) The Permittee shall determine fan amperage or duct pressure from the most recent valid stack test that demonstrates compliance with limits in condition D.1.1, as approved by IDEM.
- (e) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the duct pressure or fan amperage is outside the normal range as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C – Excursions and Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C – Excursions and Exceedances shall be considered a deviation from this permit.

Conclusion

The construction and operation of this stationary metal strapping manufacturing operation shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit 107-23528-00063.

**Appendix A: Emission Calculations
Natural Gas Combustion (NGC1)**

**Company Name: Dubose Manufacturing, Inc.
Address: 4414 East 400 South, Crawfordsville, Indiana 47993
MSOP: 107-23528-00063
Reviewer: ERG/TDP
Date: December 11, 2006**

Description	Number of Emission Units	Emission Unit ID	Heat Input Capacity Per Unit (MMBtu/hr)	Total Maximum Potential Throughput (MMCF/yr)
Heat Treat NG Burner	1	HT3 Combustion	1.50	13.1
RTO Burner	1	RT01 Burner	3.00	26.3
TOTALS	2		4.50	39.4

Emission Factor (lbs/MMCF)						
PM*	PM10*	SO ₂	NO _x **	CO	VOC	HAPs
1.9	7.6	0.6	100	84.0	5.5	0.09

Potential To Emit (tons/yr)							
Emission Unit ID	PM	PM10	SO ₂	NO _x	CO	VOC	HAPs
HT3 Combustion	0.01	0.05	0.00	0.66	0.55	0.04	5.7E-04
RT01 Burner	0.02	0.10	0.01	1.31	1.10	0.07	1.1E-03
TOTALS	0.04	0.15	0.01	1.97	1.66	0.108	1.7E-03

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

**Emission factor for NO_x: Uncontrolled = 100 lb/MMCF

Emission factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

1 MMBtu = 1,000,000 Btu

1 MMCF = 1,000,000 cubic feet of gas

All Emission factors are based on normal firing.

METHODOLOGY

Max. Potential Throughput (MMCF/yr) = Number of Units x Heat Input Capacity/Unit (MMBtu/hr) x 8,760 (hrs/yr) x 1 MMCF/1,000 MMBtu

PTE (tons/yr) = Max. Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1/2,000 (ton/lbs)

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

**Company Name: Dubose Manufacturing, Inc.
Address: 4414 East 400 South, Crawfordsville, Indiana 47993
MSOP: 107-23528-00063
Reviewer: ERG/TDP
Date: December 11, 2006**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % VOC	Volume % Water	Volume % Non-Volatiles (solids)	Usage Rate (gal/ton steel)	Maximum Throughput (tons steel/hour)	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 (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
Valspar Vectrocoat (300 Black)	8.43	38.7%	0.8%	37.9%	0.01%	55.6%	0.70	5.6	3.19	12.5	300	54.7	0.00	5.74	100%
Totals										12.5	300	54.7	0.00		
Controlled PTE**:										0.25	5.99	1.09	0.00		

Material	Density (Lb/Gal)	Usage Rate (gal/ton steel)	Maximum Throughput (tons steel/hour)	Weight % Triethylamine	Weight % Formaldehyde	Weight % 1,2,4-Trimethylbenzene	Triethylamine Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	1,2,4-Trimethylbenzene Emissions (ton/yr)	Total HAPs (ton/yr)
Valspar Vectrocoat (300 Black)	8.43	0.70	5.59	5.00%	0.10%	5.00%	7.22	0.14	7.22	14.6
Total:							7.22	0.14	7.22	14.6
Controlled PTE**:							0.14	2.89E-03	0.14	0.29

*Transfer efficiency assumed to be 100%. All materials are applied through dip coating.

** Control device = RTO with a 98% destruction efficiency

METHODOLOGY

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

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) * Usage Rate(gal/ton steel) * Maximum (tons steel/hr)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Usage Rate(gal/ton steel) * Maximum (tons steel/hr) * (24 hr/day)

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) * Usage Rate(gal/ton steel) * Maximum (tons steel/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

PTE of PM/PM10 (tons/yr) = Maximum Throughput (tons steel/hour) * Usage Rate (gal/ton steel * Density (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

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

**Appendix A: Emission Calculations
VOC Emissions from
HT3 Oil and SP4 Oil (Oil Stripping)**

**Company Name: Dubose Manufacturing, Inc.
Address: 4414 East 400 South, Crawfordsville, Indiana 47993
MSOP: 107-23528-00063
Reviewer: ERG/TDP
Date: December 11, 2006**

Material	Density (lbs/gal)	Maximum Usage Rate (gal/coil)	Maximum Throughput (coils/hour)	Pounds VOC per gallon of coating	Non-Volatiles (lbs/gal)	Total HAP Content (lb/gal)	PTE of VOC (lbs/hr)	PTE of VOC (lbs/day)	PTE of VOC (tons/yr)	PTE of PM/PM10 (ton/yr)	PTE of Total HAP (ton/yr)	Control Efficiency*	Controlled PTE of VOC (tons/year)	Controlled PTE of PM/PM10 (tons/year)	Controlled PTE of Total HAP (tons/year)
Quaker 61A-US (oil stripped)	7.50	2.00	0.25	0.44	7.06	1.05E-04	0.22	5.25	0.96	15.4	2.3E-04	98.00%	0.02	0.31	4.58E-06

*Control Device = RTO, controls VOC, HAP, and PM/PM10.

METHODOLOGY

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) * Usage Rate(gal/coil) * Maximum (coils/hr)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Usage Rate(gal/coil) * Maximum (coils/hr) * (24 hr/day)

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) * Usage Rate(gal/coil) * Maximum (coils/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

PTE of PM/PM10 (tons/yr) = Maximum Throughput (units/hour) * Usage Rate (gal/coil) * Non-Volatiles(lbs/gal) *(8760 hrs/yr) *(1 ton/2000 lbs)

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

**Appendix A: Emission Calculations
VOC Emissions From
Wax Coating Operation SP4Wax**

**Company Name: Dubose Manufacturing, Inc.
Address: 4414 East 400 South, Crawfordsville, Indiana 47993
MSOP: 107-23528-00063
Reviewer: ERG/TDP
Date: December 11, 2006**

Material	Density (lbs/gal)	Usage Rate (gal/ton steel)	Maximum Throughput (tons steel/hour)	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 (ton/yr)	Transfer Efficiency*
Strapping Wax	8.41	0.70	5.6	0.04	0.14	3.29	0.60	0.00	100%

*Transfer efficiency assumed to be 100%. All materials are applied through dip coating.

METHODOLOGY

PTE of VOC (lbs/hr) = Pounds of VOC per Gallon coating (lb/gal) * Usage Rate(gal/ton steel) * Maximum (tons steel/hr)

PTE of VOC (lbs/day) = Pounds of VOC per Gallon coating (lb/gal) * Usage Rate (gal/ton steel) * Maximum (tons steel/hr) * (24 hr/day)

PTE of VOC (tons/yr) = Pounds of VOC per Gallon coating (lb/gal) * Usage Rate (gal/ton steel) * Maximum (tons steel/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Appendix A: Emission Calculations**Summary of PTE****Company Name: Dubose Manufacturing, Inc.****Address: 4414 East 400 South, Crawfordsville, Indiana 47993****MSOP: 107-23528-00063****Reviewer: ERG/TDP****Date: December 11, 2006**

Potential To Emit (tons/yr)							
Emission Unit ID	PM	PM10	SO₂	NO_x	CO	VOC	HAPs
HT3 Comb	0.01	0.05	3.94E-03	0.66	0.55	0.04	5.7E-04
RTO1 Burner	0.02	0.10	0.01	1.31	1.10	0.07	1.1E-03
E-coat Dip Tank	0.00	0.00	--	--	--	54.7	14.6
HT3Oil & SP4Oil	15.4	15.4	--	--	--	0.96	2.3E-04
SP4Wax	0.00	--	--	--	--	0.60	--
TOTALS	15.4	15.5	0.01	1.97	1.66	56.4	14.6