



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: March 22, 2007
RE: Koontz Wagner Electric/141-23789-00545
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



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.in.gov/idem

Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

**Koontz Wagner Electric/PowerHouse Division
4755 Ameritech Drive
South Bend, Indiana 46628**

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

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

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

Operation Permit No.: MSOP 141-23789-00545	
Issued by: Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: March 22, 2007 Expiration Date: March 22, 2012

TABLE OF CONTENTS

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B.11	Prior Permits Superseded [326 IAC 2-1.1-9.5]	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

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

D.1 EMISSIONS UNIT OPERATION CONDITIONS: Surface coating operations..... 16

Emission Limitations and Standards

D.1.1 Particulate [326 IAC 6-3-2(d)]

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

D.1.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

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

D.1.4 Record Keeping Requirements

Certification 18

Annual Notification 19

Malfunction Report..... 20

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a miscellaneous metal parts painting source.

Source Address:	4755 Ameritech Drive, South Bend, Indiana 46628
Mailing Address:	4755 Ameritech Drive, South Bend, Indiana 46628
General Source Phone Number:	574-251-6030
SIC Code:	3448
County Location:	St. Joseph
Source Location Status:	Nonattainment for 8-hour ozone Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source under PSD and Emission Offset Rules 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) Surface coating operations with a total capacity of 0.05 metal parts per hour, consisting of the following:
 - (1) One (1) skid/floorplate paint booth, identified as Booth1, constructed in 2001, equipped with high volume low pressure (HVLP) spray guns to coat metal parts and dry filters for particulate control, exhausting through Stack EP1.
 - (2) One (1) building paint booth, identified as Booth 2, constructed in 2001, equipped with high volume low pressure (HVLP) spray guns to coat metal parts and dry filters for particulate control, exhausting through Stack EP2.
- (b) Six (6) metal inert gas (MIG) welding stations, identified as W1 through W6, constructed in 2001, exhausting to the general ventilation, capacity: 1.38 pounds of weld wire per hour, each.
- (c) One (1) natural gas-fired air rotation unit, identified as ARU-1, constructed in 2001, exhausting through Stack F1, heat input capacity: 1.50 million British thermal units per hour.
- (d) One (1) natural gas-fired five (5.0) ton horizontal coil furnace, identified as F2A, constructed in 2001, exhausting through Stack F2A, heat input capacity: 0.1 million British thermal units per hour.
- (e) Two (2) natural gas-fired five (5.0) ton upflow coil furnaces, identified as F2B and F2C, constructed in 2001, exhausting through stacks F2B and F2C, respectively, heat input capacity: 0.1 million British thermal units per hour, each.
- (f) One (1) natural gas-fired two (2.0) ton upflow coil furnace, identified as F3, constructed in

2001, exhausting through Stack F3, heat input capacity: 0.10 million British thermal units per hour.

- (g) One (1) natural gas-fired water heater, identified as HW1, constructed in 2001, exhausting to the general ventilation, heat input capacity: 0.40 million British thermal units per hour.
- (h) One (1) natural gas-fired pressure washer, identified as HW2, constructed in 2001, exhausting to the general ventilation, heat input capacity: 0.40 million British thermal units per hour.

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

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

- (a) This permit, MSOP 141-23789-00545, 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 13-15-3-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

B.8 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any

application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

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

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

- (a) The Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) All terms and conditions of permits established prior to MSOP 141-23789-00545 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

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

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.17 Transfer of Ownership or 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.18 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the

property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

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

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

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 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.

Corrective Actions and Response Steps

C.12 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 the "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.13 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.14 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.15 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) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description: Surface coating operations

- (a) Surface coating operations with a total capacity of 0.05 metal parts per hour, consisting of the following:
- (1) One (1) skid/floorplate paint booth, identified as Booth1, constructed in 2001, equipped with high volume low pressure (HVLV) spray guns to coat metal parts and dry filters for particulate control, exhausting through Stack EP1.
 - (2) One (1) building paint booth, identified as Booth 2, constructed in 2001, equipped with high volume low pressure (HVLV) spray guns to coat metal parts and dry filters for particulate control, exhausting through Stack EP2.

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

Emission Limitations and Standards

D.1.1 Particulate [326 IAC 6-3-2(d)]

- (a) Pursuant to 326 IAC 6-3-2(d), particulate from the one (1) skid/floorplate booth, identified as Booth 1 and the one (1) building paint booth, identified as Booth 2, shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compounds (VOC) content of coatings delivered to the applicators in Booths 1 and 2 metal coating operations shall be limited to 3.5 pounds of VOC per gallon of coating less water, for extreme performance coatings computed on a daily volume weighted basis.

D.1.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the one (1) skid/floorplate paint booth, identified as Booth 1 and the one (1) building paint booth, identified as Booth 2, during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

Compliance Determination Requirements

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

Compliance with the VOC content limit in Condition D.1.2 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:

$$\frac{\sum_{c=1}^n \text{coating } c \text{ (gal)} \times \text{H VOC content of } c \text{ (lbs/gal, less water)}}{\sum_{c=1}^n \text{coating } c \text{ (gal)}} = 1$$

Where: n is the number of coatings (c)

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a)]

Compliance with the VOC content and usage limitations 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) using formulation data supplied by the coating manufacturer.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC content limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a daily 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 volume weighted VOC content of the coatings used for each day or the maximum VOC content of coatings used when coating materials are less than a VOC content of 3.5 lbs/gal of coating, less water; and
 - (4) The cleanup solvent usage for each day.
- (b) To document compliance with Condition D.1.1, the Permittee shall maintain records as required by Condition D.1.1.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**MINOR SOURCE OPERATING PERMIT
CERTIFICATION**

Source Name: Koontz Wagner Electric/PowerHouse Division
Source Address: 4755 Ameritech Drive, South Bend, Indiana 46628
Mailing Address: 4755 Ameritech Drive, South Bend, Indiana 46628
Permit No.: MSOP 141-23789-00545

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**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).

Source Name:	Koontz Wagner Electric/PowerHouse Division
Address:	4755 Ameritech Drive
City:	South Bend, Indiana 46628
Phone #:	574-251-6030
MSOP #:	141-23789-00545

I hereby certify that Koontz Wagner Electric/PowerHouse Division is

- still in operation.
- no longer in operation.

I hereby certify that Koontz Wagner Electric/PowerHouse Division is

- in compliance with the requirements of MSOP 141-23789-00545.
- not in compliance with the requirements of MSOP 141-23789-00545.

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 PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF MALFUNCTION AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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

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

Source Background and Description

Source Name:	Koontz Wagner Electric/PowerHouse Division
Source Location:	4755 Ameritech Drive, South Bend, Indiana 46628
County:	St. Joseph
SIC Code:	3448
Operation Permit No.:	MSOP 141-15902-00545
Operation Permit Issuance Date:	January 24, 2002
Permit Renewal No.:	MSOP 141-23789-00545
Permit Reviewer:	Michael A. Morrone

The Office of Air Quality (OAQ) has reviewed an application from Koontz Wagner Electric/PowerHouse Division relating to the operation of a miscellaneous metal parts painting source.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Surface coating operations with a total capacity of 0.05 metal parts per hour, consisting of the following:
 - (1) One (1) skid/floorplate paint booth, identified as Booth1, constructed in 2001, equipped with high volume low pressure (HVLP) spray guns to coat metal parts and dry filters for particulate control, exhausting through Stack EP1.
 - (2) One (1) building paint booth, identified as Booth 2, constructed in 2001, equipped with high volume low pressure (HVLP) spray guns to coat metal parts and dry filters for particulate control, exhausting through Stack EP2.
- (b) Six (6) metal inert gas (MIG) welding stations, identified as W1 through W6, constructed in 2001, exhausting to the general ventilation, capacity: 1.38 pounds of weld wire per hour, each.
- (c) One (1) natural gas-fired air rotation unit, identified as ARU-1, constructed in 2001, exhausting through Stack F1, heat input capacity: 1.50 million British thermal units per hour.
- (d) One (1) natural gas-fired five (5.0) ton horizontal coil furnace, identified as F2A, constructed in 2001, exhausting through Stack F2A, heat input capacity: 0.1 million British thermal units per hour.
- (e) Two (2) natural gas-fired five (5.0) ton upflow coil furnaces, identified as F2B and F2C, constructed in 2001, exhausting through stacks F2B and F2C, respectively, heat input capacity: 0.1 million British thermal units per hour, each.
- (f) One (1) natural gas-fired two (2.0) ton upflow coil furnace, identified as F3, constructed in 2001, exhausting through Stack F3, heat input capacity: 0.10 million British thermal units per hour.

- (g) One (1) natural gas-fired water heater, identified as HW1, constructed in 2001, exhausting to the general ventilation, heat input capacity: 0.40 million British thermal units per hour.
- (h) One (1) natural gas-fired pressure washer, identified as HW2, constructed in 2001, exhausting to the general ventilation, heat input capacity: 0.40 million British thermal units per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

New Emission Units and Pollution Control Equipment

There are no proposed emission units during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) MSOP 141-15902-00545, issued on January 24, 2002 and
- (b) NOC to MSOP 141-15561-00545, issued on February 13, 2002.

All terms and conditions from previous approvals were either incorporated as originally stated, revised or deleted by this MSOP. The following terms and conditions have been revised:

- (a) Condition D.1.1 from MSOP 141-15902-00545:

D.1.1 Particulate Matter (PM) Limitations, Welding Stations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the combined particulate matter (PM) emissions from the welding stations shall not exceed 5.72 pounds of particulate matter per hour.

Reason not incorporated:

The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations); therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. The six (6) metal inert gas welding stations consume less than six-hundred twenty-five (625) pounds of weld wire per day. Therefore, pursuant to 326 IAC 6-3-1(b)(9), the welding is exempt from the requirements of 326 IAC 6-3-2 and the requirements of 326 IAC 6-3-2 are not included in the permit for the six (6) metal inert gas welding stations.

- (b) Condition D.1.2 from MSOP 141-15902-00545:

D.1.2 Particulate Matter (PM) Limitations, Paint Booths [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate Matter (PM) emissions from paint booths 1 and 2 shall not exceed the limits established utilizing the following equation:

$$E = 4.10 * P^{0.67} \text{ where: } \begin{array}{l} E = \text{rate of emission in pounds per hour,} \\ P = \text{process weight in tons per hour} \end{array}$$

Reason not incorporated:

The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326 IAC 6-3 (Process Operations). Therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. The one (1) skid/floorplate booth, identified as Booth 1, and the one (1) building paint booth, identified as Booth 2, need to comply with the requirements of 326 IAC 6-3-2(d), which are covered by Condition D.1.1 of this permit.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
EP1	Skid/floorplate paint booth	37.5	4.0	38,100	ambient
EP2	Building paint booth	38.0	4.0	38,100	ambient
F1	1.5 MMBtu Furnance	32.5	1.0	passive	150
F2A	5 ton furnace (horizontal coil)	31.9"	0.5	passive	150
F2B	5 ton furnace (upflow coil)	17.4	0.5	passive	150
F2C	5 ton furnace (upflow coil)	17.3	0.5	passive	150
F3	2 ton furnace (upflow coil)	17.5	0.5	passive	150
HW1	Hot water heater	33.4	1.0	passive	150
HW2	Pressure washer	17.5	0.33	passive	140

Recommendation

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

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

An application for the purposes of this review was received on October 18, 2006, with additional information received on December 26 and 27, 2006 and January 8 and 17, 2007.

Emission Calculations

See pages 1 through 6 of Appendix A of this document for detailed emissions calcuations.

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	15.7
PM ₁₀	15.8
SO ₂	0.007
VOC	33.7
CO	0.993
NO _x	1.18

HAPs	Potential to Emit (tons/yr)
Xylene	9.48
Toluene	3.58
Etyhl Benzene	2.90
MIBK	2.38
Hexamethylene Diisocyanate	0.021
Hexane	0.021
Manganese	0.018
Formaldehyde, Dicholorobenzene, Benzene, Nickel, Chromium, Cadmium, Lead	Less than or equal to 0.001
Total	18.4

- (a) The potential to emit VOC is greater than twenty-five (25.0) tons per year and the potential to emit of all criteria pollutants is less than one hundred (100) 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 any single HAP is less than ten (10.0) tons per year and the potential to emit a combination of all HAPs is less than twenty-five (25.0) tons per year. Therefore, the requirements of 326 IAC 2-7, Part 70, are not applicable.

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM _{2.5}	attainment
PM ₁₀	attainment
SO ₂	attainment
NO _x	attainment
8-Hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements of 326 IAC 2-3, Emission Offset. See the State Rule Applicability - Entire Source section of this document.
- (b) St. Joseph County has been classified as unclassifiable or attainment for PM_{2.5}. 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 PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability - Entire Source section of this document.
- (c) St. Joseph County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, NO_x, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section of this document.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Delaware, Greene, Jackson, Vanderburgh, Vigo and Warrick Counties to attainment for the eight-hour ozone standard, redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.
- (e) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	0.229
PM ₁₀	0.367
SO ₂	0.007
VOC	33.7
CO	0.993
NO _x	1.18
Single HAP	9.48
Combination HAPs	18.4

- (a) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of one-hundred (100) tons per year or greater and it is not in one of the twenty-eight (28) listed source categories.
- (b) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of two-hundred fifty (250) tons per year or greater and it is not in one of the twenty-eight (28) listed source categories.
- (c) Emissions were based on pages 1 through 6 of Appendix A of this document.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 141-23789-00545, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than one-hundred (100) tons per year,
- (b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and
- (c) the combination of HAPs is less than twenty-five (25) tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

- (a) The one (1) natural gas-fired air rotation unit, identified as ARU-1, the one (1) natural gas-fired five (5.0) ton horizontal coil furnace, identified as F2A, the two (2) natural gas-fired five (5.0) ton upflow coil furnaces, identified as F2B and F2C, and the one (1) natural gas-fired two (2.0) ton upflow coil furnace, identified as F3, are not steam generating units. Therefore, the requirements of the New Source Performance Standards, 40 CFR 60, Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam

Generators for Which Construction is Commenced After August 17, 1971, Subpart Da, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, and Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, are not included in the permit.

- (b) The one (1) natural gas-fired water heater, identified as HW1, and the one (1) natural gas-fired pressure washer, identified as HW2, have heat input capacities of 0.40 million British thermal units per hour, each, which are less than 250 million British thermal units per hour. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, are not included in the permit.
- (c) The one (1) natural gas-fired water heater, identified as HW1, and the one (1) natural gas-fired pressure washer, identified as HW2, have heat input capacities of 0.40 million British thermal units per hour, each, which are less than 250 million British thermal units per hour. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Da, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978, are not included in the permit.
- (d) The one (1) natural gas-fired water heater, identified as HW1, and the one (1) natural gas-fired pressure washer, identified as HW2, have heat input capacities of 0.40 million British thermal units per hour, each, which are less than 100 million British thermal units per hour. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, are not included in the permit.
- (e) The one (1) natural gas-fired water heater, identified as HW1, and the one (1) natural gas-fired pressure washer, identified as HW2, have heat input capacities of 0.40 million British thermal units per hour, each, which are not between 10 and 100 million British thermal units per hour. Therefore, the requirements of the New Source Performance Standard, 40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, are not included in the permit.
- (f) There are no other New Source Performance Standards included in the permit.
- (g) The source is an area source for HAPs. Therefore, the requirements of 40 CFR 63, Subpart M, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, are not included in the permit.
- (h) The source is an area source for HAPs. Therefore, the requirements of 40 CFR 63, Subpart D, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, are not included in the permit.
- (i) There are no other National Emission Standards for Hazardous Air Pollutants included in the permit.

State Rule Applicability – Entire Source

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

The unrestricted potential emissions of each attainment criteria pollutant are less than two-hundred fifty (250) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is a minor source pursuant to 326 IAC 2-2, PSD.

326 IAC 2-3 (Emission Offset)

The unrestricted potential emissions of each nonattainment criteria pollutant are less than one-hundred (100) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is a minor source pursuant to 326 IAC 2-3, Emission Offset.

326 IAC 2-4.1-1 (New source toxics control)

The operation of the source will emit less than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is not located in Lake or Porter County, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability – Individual Facilities

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

The one (1) natural gas-fired air rotation unit, identified as ARU-1, the one (1) natural gas-fired five (5.0) ton horizontal coil furnace, identified as F2A, the two (2) natural gas-fired five (5.0) ton upflow coil furnaces, identified as F2B and F2C, the one (1) natural gas-fired two (2.0) ton upflow coil furnace, identified as F3, the one (1) natural gas-fired water heater, identified as HW1, and the one (1) natural gas-fired pressure washer, identified as HW2, are not sources of indirect heating. Therefore, the requirements of 326 IAC 6-2, Particulate Emission Limitations for Sources of Indirect Heating, are not applicable.

326 IAC 6.5 (Particulate Matter Limitations Except Lake County)

The source is located in St. Joseph County, but has potential PM emissions of less than one-hundred (100) tons per year and actual PM emissions of less than ten (10.0) tons per year. Therefore, the requirements of 326 IAC 6.5, Particulate Matter Limitations Except Lake County, are not applicable.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) Pursuant to 326 IAC 6-3-1(c)(3), the requirements of 326 IAC 6.5 could apply if its requirements are more stringent than those established in 326 IAC 6-3. However, the requirements of 326 IAC 6.5 do not apply. Therefore, 326 IAC 6-3 is more stringent and the requirements of 326 IAC 6-3-2, Particulate Matter Limitations for Manufacturing Processes, are applicable.
- (b) Pursuant to 326 IAC 6-3-2(d), the dry particulate filters for particulate control shall be operation in accordance with manufacturer's specifications and control emissions from the one (1) skid/floorplate paint booth, identified as Booth 1 and the one (1) building paint booth, identified as Booth 2, at all times when the one (1) skid/floorplate paint booth and the one (1) building paint booth are in operation. If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground. If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.
- (c) The six (6) metal inert gas welding stations, identified as W1 through W6, use less than six-hundred twenty-five (625) pounds of weld wire per day. Therefore, pursuant to 326 IAC 6-3-1(b)(9), the requirements of 326 IAC 6-3-2 are not applicable.
- (d) The one (1) natural gas-fired air rotation unit, identified as ARU-1, the one (1) natural gas-fired five (5.0) ton horizontal coil furnace, identified as F2A, the two (2) natural gas-fired five (5.0) ton upflow coil furnaces, identified as F2B and F2C, the one (1) natural gas-fired two (2.0) ton upflow coil furnace, identified as F3, the one (1) natural gas-fired water heater, identified as HW1, and the one (1) natural gas-fired pressure washer, identified as HW2, each have particulate matter emissions of less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3-2 are not applicable.

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

The one skid/floorplate paint booth, identified as Booth 1, and the one (1) building paint booth, identified as Booth 2, have actual VOC emissions of greater than fifteen (15.0) pounds per day and were constructed after July 1, 1990. Therefore, pursuant to 326 IAC 8-2-1(a)(4), the requirements of 326 IAC 8-2-9, Miscellaneous Metal Coating are applicable.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the one (1) skid/floorplate paint booth, identified as Booth 1, and the one (1) building paint booth, identified as Booth 2 shall be limited to 3.5 pounds of VOC per gallon of coating less water, for extreme performance coatings.

In order to ensure compliance with the requirements of 326 IAC 8-2-9, volume weighted averaging of all coatings used per day will be required. The daily volume weighted average of VOC content from Booths 1 and 2 shall be calculated only on days when one (1) or more of the coating materials exceed a VOC content of 3.5 pounds of VOC per gallon of coating less water using the following formula, where n is the number of coatings (c):

$$\frac{\sum_{c=1}^n \text{3 coating c (gal) H VOC content of c (lbs/gal, less water)}}{c = n}$$

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

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 Determination Requirements applicable to this source are as follows:

The one (1) floor/skidplate paint booth, identified as Booth 1, and the one (1) building paint booth, identified as Booth 2, have the following Compliance Determination Requirements:

- (a) In order to ensure compliance with the requirements of 326 IAC 8-2-9, volume weighted averaging of all coatings used per day will be required. The daily volume weighted average of VOC content from Booths 1 and 2 shall be calculated only on days when one (1) or more of the coating materials exceed a VOC content of 3.5 pounds of VOC per gallon of coating less water using the following formula, where n is the number of coatings (c):

$$\frac{c = n}{c = 1} \times \frac{3 \text{ coating } c \text{ (gal)} \times \text{H VOC content of } c \text{ (lbs/gal, less water)}}{c = n} \times \frac{3 \text{ coating } c \text{ (gal)}}{c = 1}$$

- (b) Compliance with the VOC emission limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

Conclusion

The operation of this miscellaneous metal parts painting source shall be subject to the conditions of the **Minor Source Operating Permit 141-23789-00545**.

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

**Company Name: Koontz Wagner Electric/ Power House Division
Address City IN Zip: 4755 Ameritech Drive, South Bend, IN 46628
MSOP Renewal: 141-23789-00545
Plt ID: 141-00545
Reviewer: Michael A. Morrone
Application Date: October 18, 2006**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Surface Coating Operations																
95-248 Primer	9.67	29.6%	0.00%	29.6%	0.00%	70.4%	5.00	0.050	2.86	2.86	0.715	17.2	3.13	1.86	4.07	75%
95-249 Primer	12.7	13.0%	0.00%	13.0%	0.00%	87.0%	5.00	0.050	1.64	1.64	0.411	9.87	1.80	3.02	1.89	75%
97-725 Thinner	7.26	100%	0.00%	100%	0.00%	0.00%	7.50	0.050	7.26	7.26	2.72	65.3	11.9	0.00	n/a	75%
97-1200 Polyimide	11.3	27.5%	0.00%	27.5%	0.00%	72.5%	10.0	0.050	3.10	3.10	1.55	37.2	6.79	4.48	4.28	75%
97-137 Epoxy	10.5	29.6%	0.00%	29.6%	0.00%	70.4%	10.0	0.050	3.11	3.11	1.55	37.3	6.81	4.05	4.41	75%
95-8001 Acrylic	12.0	21.0%	0.00%	21.0%	0.00%	79.5%	3.00	0.050	2.52	2.52	0.38	9.07	1.66	1.56	3.17	75%
95-819 Isocyanate	9.76	0.00%	0.00%	0.00%	0.00%	100%	1.00	0.050	0.00	0.00	0.00	0.00	0.00	0.534	0.00	75%
97-735 Thinner	6.80	100%	0.00%	100%	0.00%	0.00%	1.00	0.050	6.80	6.80	0.340	8.16	1.49	0.00	n/a	75%

*The maximum capacity of the source is 1 unit every 20 hours, or 0.05 units per hour.

PM Control Efficiency: 99.5%

Add worst case coating to all solvents

Uncontrolled	7.67	184.1	33.6	15.5
Controlled	7.67	184.1	33.6	0.077

METHODOLOGY

Since the two (2) booths, identified as Booth 1 and Booth 2, use the same combination and amounts of materials, to determine the emissions for each booth, divide the amounts in the table above by 2.

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

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

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

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

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations
HAP Emission Calculations**

**Company Name: Koontz Wagner Electric/ Power House Division
Address City IN Zip: 4755 Ameritech Drive, South Bend, IN 46628
MSOP Renewal: 141-23789-00545
Plt ID: 141-00545
Permit Reviewer: Michael A. Morrone
Application Date: October 18, 2006**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethyl Benzene	Weight % MIBK	Weight % Naphthalene	Weight % Toluene	Weight % Xylene	Weight % Hexamethylene Diisocyanate	Ethyl Benzene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	Hexamethylene Diisocyanate Emissions (ton/yr)	Total Emissions (ton/yr)
Surface Coating Operations															
95-248 Primer	9.67	5.00	0.050	5.00%	0.00%	0.00%	0.00%	10.00%	0.00%	0.529	0.00	0.00	1.06	0.00	1.59
95-249 Primer	12.7	5.00	0.050	1.00%	0.00%	0.00%	0.00%	1.50%	0.00%	0.139	0.00	0.00	0.208	0.00	0.347
97-725 Thinner	7.26	7.50	0.050	7.00%	0.00%	0.00%	30.0%	40.0%	0.00%	0.835	0.00	3.58	4.77	0.00	9.18
97-1200 Polyimide	11.3	10.0	0.050	1.00%	5.00%	0.00%	0.00%	1.50%	0.00%	0.247	1.24	0.00	0.371	0.00	1.85
97-137 Epoxy	10.5	10.0	0.050	5.00%	5.00%	0.00%	0.00%	13.0%	0.00%	1.15	1.15	0.00	2.99	0.00	5.29
95-8001 Acrylic	12.0	3.00	0.050	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00	0.00	0.00	0.08	0.00	0.08
95-819 Isocyanate	9.76	1.00	0.050	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00	0.00	0.00	0.00	0.021	0.0
97-735 Thinner	6.80	1.00	0.050	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.0
Summed worst case for each coating combination.									Totals	2.90	2.38	3.58	9.48	0.021	18.4

METHODOLOGY

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

**Company Name: Koontz Wagner Electric/ Power House Division
Address City IN Zip: 4755 Ameritech Drive, South Bend, IN 46628
MSOP Renewal: 141-23789-00545
Plt ID: 141-00545
Reviewer: Michael A. Morrone
Application Date: October 18, 2006**

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.600	100 **see below	5.50	84.0

*PM emission factor is filterable PM only. PM-10 emission factor is filterable and condensable PM-10 combined.

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

Equipment	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission in tons/yr					
			PM*	PM10*	SO2	NOx	VOC	CO
One (1) natural gas fired air rotation unit, identified as ARU-1	1.50	13.1	0.012	0.050	0.004	0.657	0.036	0.552
One (1) natural gas fired five (5.0) ton horizontal coil furnace, identified as F2A	0.100	0.876	0.001	0.003	0.0003	0.044	0.002	0.037
Two (2) natural gas fired five (5.0) ton upflow coil furnaces, identified as F2B and F2C	0.200	1.75	0.002	0.007	0.001	0.088	0.005	0.074
One (1) natural gas fired two (2.0) ton upflow coil furnace, identified as F3	0.100	0.876	0.001	0.003	0.0003	0.044	0.002	0.037
One (1) natural gas fired water heater, identified as HW1	0.400	3.50	0.003	0.013	0.001	0.175	0.010	0.147
One (1) natural gas fired pressure washer, identified as HW2	0.400	3.50	0.003	0.013	0.001	0.175	0.010	0.147
Total	2.70	23.7	0.022	0.090	0.007	1.18	0.065	0.993

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(SUPPLEMENT D 3/98)

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

See page 4 for HAPs emissions calculations.

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

**Company Name: Koontz Wagner Electric/ Power House Division
 Address City IN Zip: 4755 Ameritech Drive, South Bend, IN 46628
 MSOP Renewal: 141-23789-00545
 Plt ID: 141-00545
 Reviewer: Michael A. Morrone
 Application Date: October 18, 2006**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 0.002	Dichlorobenzene 0.001	Formaldehyde 0.075	Hexane 1.80	Toluene 0.003
Potential Emission in tons/yr	0.00002	0.00001	0.001	0.021	0.00004

HAPs - Metals

Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.001	Manganese 0.0004	Nickel 0.002	Total HAPs
Potential Emission in tons/yr	0.00001	0.00001	0.00002	0.000004	0.00002	0.022

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

**Company Name: Koontz Wagner Electric/ Power House Division
Address City IN Zip: 4755 Ameritech Drive, South Bend, IN 46628
MSOP Renewal: 141-23789-00545
Plt ID: 141-00545
Reviewer: Michael A. Morrone
Application Date: October 18, 2006**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Metal Inert Gas (MIG)(carbon steel)	6.00	1.38	0.0055	0.0005			0.046	0.004	0.000	0.00	0.004
EMISSION TOTALS											
Potential Emissions lbs/hr							0.046	0.004	0.00	0.00	0.004
Potential Emissions lbs/day							1.09	0.099	0.00	0.00	0.099
Potential Emissions tons/year							0.199	0.018	0.00	0.00	0.018

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lb

**Appendix A: Emissions Calculations
Summary**

Company Name: Koontz Wagner Electric/ Power House Division
Address City IN Zip: 4755 Ameritech Drive, South Bend, IN 46628
MSOP Renewal: 141-23789-00545
Plt ID: 141-00545
Reviewer: Michael A. Morrone
Application Date: October 18, 2006

Summary of Emissions

Uncontrolled Potential Emissions

<i>Significant Emission Units</i>	PM	PM-10	SO2	NOx	VOC	CO	Ethyl Benzene	MIBK	Hexamethylene Diisocyanate	Xylene	Lead	Cadmium	Chromium	Manganese	Nickel	Benzene	Dichloro-benzene	Formal-dehyde	Hexane	Toluene	Total HAPs	
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	
Surface Coating Operations	15.5	15.5	0.00	0.00	33.6	0.00	2.90	2.38	0.021	9.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.58	18.4	
Six (6) metal inert gas (MIG) welding stations, identified as W1 through W6	0.199	0.199	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.018	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.018
Natural gas-fired combustion sources	0.022	0.090	0.007	1.18	0.065	0.993	0.00	0.000	0.000	0.000	0.00001	0.00001	0.00002	0.000004	0.00002	0.00002	0.00001	0.001	0.021	0.00004	0.022	
Total	15.7	15.8	0.007	1.18	33.7	0.993	2.90	2.38	0.021	9.48	0.00001	0.00001	0.00002	0.018	0.00002	0.00002	0.00001	0.001	0.021	3.58	18.4	

Controlled Potential Emissions

<i>Significant Emission Units</i>	PM	PM-10	SO2	NOx	VOC	CO	Ethyl Benzene	MIBK	Hexamethylene Diisocyanate	Xylene	Lead	Cadmium	Chromium	Manganese	Nickel	Benzene	Dichloro-benzene	Formal-dehyde	Hexane	Toluene	Total HAPs	
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)
Surface Coating Operations	0.077	0.077	0.00	0.00	33.6	0.00	2.90	2.38	0.02	9.48	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	3.58	18.36	
Six (6) metal inert gas (MIG) welding stations, identified as W1 through W6	0.199	0.199	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.018	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.018
Natural gas-fired combustion sources	0.022	0.090	0.007	1.18	0.065	0.993	0.000	0.000	0.000	0.000	0.00001	0.00001	0.00002	0.000004	0.00002	0.00002	0.00001	0.001	0.021	0.00004	0.022	
Total	0.299	0.367	0.007	1.18	33.7	0.993	2.90	2.38	0.021	9.48	0.00001	0.00001	0.00002	0.018	0.00002	0.00002	0.00001	0.001	0.021	3.58	18.4	