



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: April 12, 2007  
RE: M & S Industrial Metal Fabricators, Inc./ 069-23851-00074  
FROM: Nisha Sizemore  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FNPER.dot 03/23/06



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Indianapolis, Indiana 46204-2251  
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**New Source Review and  
Minor Source Operating Permit  
OFFICE OF AIR QUALITY**

**M & S Industrial Metal Fabricators, Inc.  
5 Commercial Road  
Huntington, Indiana 46750**

(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.

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 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-6.1-6, applicable to those conditions.

Operation Permit No.: MSOP 069-23851-00074	
Original Signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: April 12, 2007  Expiration Date: April 12, 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)]

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The Permittee owns and operates a tool and die manufacturing source.

Source Address:	5 Commercial Road, Huntington, Indiana 46750
Mailing Address:	5 Commerical Road, Huntington, Indiana 46750
General Source Phone Number:	260-356-0300
SIC Code:	3499
County Location:	Huntington
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source under PSD rules Not 1 of 28 Major Source Categories Area Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) laser cutting table, identified as L, constructed in 1997, equipped with a cartridge filter for particulate control, identified as DC1, exhausting through a stack, identified as S1, cutting a maximum metal thickness of 0.37 inches, with a cutting rate of 787 inches of metal per minute and a throughput capacity of 160 pounds of steel per hour. (DC 1 does not have to be operated to comply with any rules.)
- (b) Four (4) spot welding stations, identified as SW, constructed in 1971, equipped with a filter for particulate control, identified as DC2, exhausting to the general ventilation, capacity: 75 steel parts per hour or 160 pounds of steel per hour, total. (DC 2 does not have to be operated to comply with any rules.)
- (c) Four (4) metal inert gas (MIG) welding stations, identified as MIG, constructed in 1971, equipped with a filter for particulate control, identified as DC 2, exhausting to the general ventilation, throughput capacity of 75 steel parts per hour or 160 pounds of steel per hour total, using 1.20 pounds of weld wire per hour, total. (DC 2 does not have to be operated to comply with any rules.)
- (d) One (1) hand grinding operation, identified as HG, constructed in 1971, exhausting to the general ventilation, capacity: 30 steel parts per hour or 32.0 pounds of steel per hour.
- (e) One (1) Tool and Die Shop abrasive blast cabinet, identified as SB1, constructed in 1971, equipped with a cartridge filter for particulate control, identified as DC3, capacity: 0.02 pounds of steel parts per hour.
- (f) One (1) maintenance abrasive blast cabinet, identified as SB2, constructed in 1971, equipped with a cartridge filter for particulate control, identified as DC4, capacity: 0.04 pounds of steel parts per hour. (DC 4 does not have to be operated to comply with any rules.)

- (g) Three (3) Tool and Die Shop bench grinders, identified as BG, constructed in 1971, equipped with a cartridge filter for particulate control, identified as DC3, capacity: 3.00 pounds of steel parts per hour, total. (DC 3 does not have to be operated to comply with any rules.)
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
  - (1) One (1) natural gas-fired space heater, identified as H1, constructed in 1971, exhausting through a vent, identified as V1, heat input capacity: 0.35 million British thermal units per hour.
  - (2) One (1) natural gas-fired space heater, identified as H2, constructed in 1971, exhausting through a vent, identified as V2, heat input capacity: 0.30 million British thermal units per hour.
  - (3) One (1) natural gas-fired space heater, identified as H3, constructed in 1971, exhausting through a vent, identified as V3, heat input capacity: 0.075 million British thermal units per hour.
  - (4) One (1) natural gas-fired space heater, identified as H4, constructed in 1971, exhausting through a vent, identified as V4, heat input capacity: 0.30 million British thermal units per hour.
  - (5) One (1) natural gas-fired space heater, identified as H5, constructed in 1971, exhausting through a vent, identified as V5, heat input capacity: 0.345 million British thermal units per hour.
  - (6) One (1) natural gas-fired space heater, identified as H6, constructed in 1971, exhausting through a vent, identified as V6, heat input capacity: 0.15 million British thermal units per hour.
  - (7) One (1) natural gas-fired space heater, identified as H7, constructed in 1971, exhausting through a vent, identified as V7, heat input capacity: 0.350 million British thermal units per hour.
- (i) Two (2) parts washers, identified as SK1 and SK2, constructed in 2002, capacity: 0.25 gallons of solvent per day, total.
- (j) Two (2) hot melt adhesive stations, identified as ADV, constructed in 2002, exhausting to the general ventilation, using 2.16 pounds per hour of hot melt adhesive, with a throughput capacity of 160 pounds of steel parts per hour.
- (k) One (1) power coating spray booth, identified as PC, approved for construction in 2007, equipped with a filter for particulate control, exhausting to the general ventilation, using electrostatic air atomized spray guns to coat steel parts, capacity: 31.25 pounds of powder coating per hour and 125 steel parts or 7,000 pounds of steel parts per hour.
- (l) One (1) natural gas-fired washer, identified as W, approved for construction in 2007, exhausting through a stack, identified as S2, with a heat input capacity of 2.00 million British thermal units per hour, a throughput capacity of 125 steel parts per hour, and using 0.09 gallons per hour of iron phosphate solution to wash steel parts.
- (m) One (1) natural gas-fired drying oven, identified as O1, approved for construction in 2007, exhausting through a stack, identified as S3, with a heat input capacity of 1.20 million British thermal units per hour, a throughput capacity of 125 steel parts per hour.



- (n) One (1) natural gas-fired powder coating baking oven, identified as O2, approved for construction in 2007, exhausting through a stack, identified as S4, with a heat input capacity of 1.20 million British thermal units per hour and a throughput capacity of 20.80 pounds of powder coating or 125 steel parts per hour.
  
- (o) One (1) natural gas-fired space heater, identified as H8, approved for construction in 2007, exhausting through a vent, identified as V8, heat input capacity: 0.175 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 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, 069-23851-00074, 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**

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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**

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

**B.9 Duty to Provide Information**

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- (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**

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- (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)]**

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- (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.12 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (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]**

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- (a) All terms and conditions of permits established prior to 069-23851-00074 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)]**

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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]**

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- (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]**

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- (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.17 Source Modification Requirement**

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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]**

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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 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 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.9 Performance Testing [326 IAC 3-6]**

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- (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.10 Compliance Requirements [326 IAC 2-1.1-11]**

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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.11 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.12 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.

### **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 when operation begins.

#### **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) 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.

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## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description: Powder coating process

- (k) One (1) power coating spray booth, identified as PC, approved for construction in 2007, equipped with a filter for particulate control, exhausting to the general ventilation, using electrostatic air atomized spray guns to coat steel parts, capacity: 31.25 pounds of powder coating per hour and 125 steel parts or 7,000 pounds of steel parts per hour.
- (l) One (1) natural gas-fired washer, identified as W, approved for construction in 2007, exhausting through a stack, identified as S2, with a heat input capacity of 2.00 million British thermal units per hour, a throughput capacity of 125 steel parts per hour, and using 0.09 gallons per hour of iron phosphate solution to wash steel parts.
- (m) One (1) natural gas-fired drying oven, identified as O1, approved for construction in 2007, exhausting through a stack, identified as S3, with a heat input capacity of 1.20 million British thermal units per hour, a throughput capacity of 125 steel parts per hour.
- (n) One (1) natural gas-fired powder coating baking oven, identified as O2, approved for construction in 2007, exhausting through a stack, identified as S4, with a heat input capacity of 1.20 million British thermal units per hour and a throughput capacity of 20.80 pounds of powder coating or 125 steel parts per hour.

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

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

#### D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2) (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the one (1) powder coating spray booth, identified as PC, shall not exceed 9.52 pounds per hour when operating at a process weight rate of 7,031.25 pounds (3.52 tons) per hour.

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

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

#### D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) powder coating booth, identified as PC, and its dry particulate filter.

### Compliance Determination Requirements

#### D.1.3 Particulate Control

In order to comply with Condition D.2.1, the dry particulate filter for particulate control shall be in operation and control emissions from the one (1) powder coating spray booth, identified as PC, at all times that the one (1) powder coating spray booth is in operation.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description: Degreasing Operations

- (i) Two (2) parts washers, identified as SK1 and SK2, constructed in 2002, capacity: 0.25 gallons of solvent per day, total.

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

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

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

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

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

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

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

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

**MINOR SOURCE OPERATING PERMIT  
CERTIFICATION**

Source Name: M & S Industrial Metal Fabricators, Inc.  
Source Address: 5 Commercial Road, Huntington, Indiana 46750  
Mailing Address: 5 Commerical Road, Huntington, Indiana 46750  
Permit No.: MSOP 069-23851-00074

**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).

<b>Source Name:</b>	<b>M &amp; S Industrial Metal Fabricators, Inc.</b>
<b>Address:</b>	<b>5 Commercial Road</b>
<b>City:</b>	<b>Huntington, Indiana 46750</b>
<b>Phone #:</b>	<b>260-356-0300</b>
<b>MSOP #:</b>	<b>069-23851-00074</b>

I hereby certify that M & S Industrial Metal Fabricators, Inc. is

- still in operation.
- no longer in operation.

I hereby certify that M & S Industrial Metal Fabricators, Inc. is

- in compliance with the requirements of MSOP 069-23851-00074.
- not in compliance with the requirements of MSOP 069-23851-00074.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

**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:

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**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**

<b>Source Name:</b>	<b>M &amp; S Industrial Metal Fabricators, Inc.</b>
<b>Source Location:</b>	<b>5 Commercial Road, Huntington, Indiana 46750</b>
<b>County:</b>	<b>Huntington</b>
<b>SIC Code:</b>	<b>3499</b>
<b>Operation Permit No.:</b>	<b>MSOP 069-23851-00074</b>
<b>Permit Reviewer:</b>	<b>Michael A. Morrone</b>

The Office of Air Quality (OAQ) has reviewed an application from M & S Industrial Metal Fabricators, Inc. relating to the construction and operation of a tool and die manufacturing source.

**Permitted Emission Units and Pollution Control Equipment**

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

**Unpermitted Emission Units and Pollution Control Equipment**

The source also consists of the following unpermitted emission units:

- (a) One (1) laser cutting table, identified as L, constructed in 1997, equipped with a cartridge filter for particulate control, identified as DC1, exhausting through a stack, identified as S1, cutting a maximum metal thickness of 0.37 inches, with a cutting rate of 787 inches of metal per minute and a throughput capacity of 160 pounds of steel per hour. (DC 1 does not have to be operated to comply with any rules.)
- (b) Four (4) spot welding stations, identified as SW, constructed in 1971, equipped with a filter for particulate control, identified as DC2, exhausting to the general ventilation, capacity: 75 steel parts per hour or 160 pounds of steel per hour, total. (DC 2 does not have to be operated to comply with any rules.)
- (c) Four (4) metal inert gas (MIG) welding stations, identified as MIG, constructed in 1971, equipped with a filter for particulate control, identified as DC 2, exhausting to the general ventilation, throughput capacity of 75 steel parts per hour or 160 pounds of steel per hour total, using 1.20 pounds of weld wire per hour, total. (DC 2 does not have to be operated to comply with any rules.)
- (d) One (1) hand grinding operation, identified as HG, constructed in 1971, exhausting to the general ventilation, capacity: 30 steel parts per hour or 32.0 pounds of steel per hour.
- (e) One (1) Tool and Die Shop abrasive blast cabinet, identified as SB1, constructed in 1971, equipped with a cartridge filter for particulate control, identified as DC3, capacity: 0.02 pounds of steel parts per hour.
- (f) One (1) maintenance abrasive blast cabinet, identified as SB2, constructed in 1971, equipped with a cartridge filter for particulate control, identified as DC4, capacity: 0.04 pounds of steel parts per hour. (DC 4 does not have to be operated to comply with any rules.)

- (g) Three (3) Tool and Die Shop bench grinders, identified as BG, constructed in 1971, equipped with a cartridge filter for particulate control, identified as DC3, capacity: 3.00 pounds of steel parts per hour, total. (DC 3 does not have to be operated to comply with any rules.)
- (h) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
  - (1) One (1) natural gas-fired space heater, identified as H1, constructed in 1971, exhausting through a vent, identified as V1, heat input capacity: 0.35 million British thermal units per hour.
  - (2) One (1) natural gas-fired space heater, identified as H2, constructed in 1971, exhausting through a vent, identified as V2, heat input capacity: 0.30 million British thermal units per hour.
  - (3) One (1) natural gas-fired space heater, identified as H3, constructed in 1971, exhausting through a vent, identified as V3, heat input capacity: 0.075 million British thermal units per hour.
  - (4) One (1) natural gas-fired space heater, identified as H4, constructed in 1971, exhausting through a vent, identified as V4, heat input capacity: 0.30 million British thermal units per hour.
  - (5) One (1) natural gas-fired space heater, identified as H5, constructed in 1971, exhausting through a vent, identified as V5, heat input capacity: 0.345 million British thermal units per hour.
  - (6) One (1) natural gas-fired space heater, identified as H6, constructed in 1971, exhausting through a vent, identified as V6, heat input capacity: 0.15 million British thermal units per hour.
  - (7) One (1) natural gas-fired space heater, identified as H7, constructed in 1971, exhausting through a vent, identified as V7, heat input capacity: 0.350 million British thermal units per hour.
- (i) Two (2) parts washers, identified as SK1 and SK2, constructed in 2002, capacity: 0.25 gallons of solvent per day, total.
- (j) Two (2) hot melt adhesive stations, identified as ADV, constructed in 2002, exhausting to the general ventilation, using 2.16 pounds per hour of hot melt adhesive, with a throughput capacity of 160 pounds of steel parts per hour.

### **New Emission Units and Pollution Control Equipment**

The application includes information relating to the prior approval for the construction and operation of the following new equipment:

- (k) One (1) power coating spray booth, identified as PC, approved for construction in 2007, equipped with a filter for particulate control, exhausting to the general ventilation, using electrostatic air atomized spray guns to coat steel parts, capacity: 31.25 pounds of powder coating per hour and 125 steel parts or 7,000 pounds of steel parts per hour.

- (l) One (1) natural gas-fired washer, identified as W, approved for construction in 2007, exhausting through a stack, identified as S2, with a heat input capacity of 2.00 million British thermal units per hour, a throughput capacity of 125 steel parts per hour, and using 0.09 gallons per hour of iron phosphate solution to wash steel parts.
- (m) One (1) natural gas-fired drying oven, identified as O1, approved for construction in 2007, exhausting through a stack, identified as S3, with a heat input capacity of 1.20 million British thermal units per hour, a throughput capacity of 125 steel parts per hour.
- (n) One (1) natural gas-fired powder coating baking oven, identified as O2, approved for construction in 2007, exhausting through a stack, identified as S4, with a heat input capacity of 1.20 million British thermal units per hour and a throughput capacity of 20.80 pounds of powder coating or 125 steel parts per hour.
- (o) One (1) natural gas-fired space heater, identified as H8, approved for construction in 2007, exhausting through a vent, identified as V8, heat input capacity: 0.175 million British thermal units per hour.

**Existing Approvals**

This is the first air approval issued to the source.

**Enforcement Issue**

- (a) IDEM is aware that the one (1) laser table, identified as L, the four (4) spot welding stations, identified as SW, the four (4) metal inert gas (MIG) welding stations, identified as MIG, the one (1) hand grinding operation, identified as HG, the one (1) Tool and Die Shop abrasive blast cabinet, identified as SB1, the one (1) maintenance abrasive blast cabinet, identified as SB2, the three (3) Tool and Die Shop bench grinders, identified as BG, the seven (7) natural gas-fired space heaters, identified as H1 through H7, the two (2) parts washers, identified as SK1 and SK2, and the two (2) hot melt adhesive stations, identified as ADV, have been constructed and operated prior to receipt of the proper permit. This equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

**Stack Summary**

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
S1	Laser cutting table	5.00	1.00	6300	80.0
V1-V6	Natural gas-fired space heaters	16.0	0.50	n/a	180
V7	Natural gas-fired space heater	22.0	0.50	n/a	180
S2	Natural gas-fired washer	22.0	1.00	n/a	180
S3	Natural gas-fired drying oven	22.0	1.00	n/a	180

S4	Natural gas-fired powder baking oven	22.0	1.00	n/a	180
V8	Natural gas-fired space heater	20.0	0.50	n/a	180

### Recommendation

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

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

An application for the purposes of this review was received on November 3, 2006, with additional information received on December 6 and 11, 2006.

### Emission Calculations

See pages 1 through 11 of Appendix A of this document for detailed emissions calculations.

### 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	50.8
PM <sub>10</sub>	44.0
SO <sub>2</sub>	0.017
VOC	1.99
CO	2.37
NO <sub>x</sub>	2.83

HAPs	Potential to Emit (tons/yr)
Manganese	0.179
Hexane	0.051
Diethylene Glycol	0.013
Lead	0.002
Formaldehyde	0.002
Benzene, Dichlorobenzene, Toluene, Cadmium, Chromium, Nickel	Less than 0.001, each
Total	0.249

The potential to emit PM and PM<sub>10</sub> are 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.

### County Attainment Status

The source is located in Huntington County.

Pollutant	Status
PM <sub>2.5</sub>	attainment
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>x</sub>	attainment
8-Hour Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) 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<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Huntington County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> 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.
- (b) Huntington County has been classified as unclassifiable or attainment for PM<sub>2.5</sub>. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM<sub>2.5</sub> emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as a

surrogate for PM<sub>2.5</sub> emissions. See the State Rule Applicability – Entire Source section of this document.

- (c) Huntington County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section 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 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 applicability.

#### Source Status

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

Pollutant	Emissions (tons/yr)
PM	14.4
PM <sub>10</sub>	7.64
SO <sub>2</sub>	0.005
VOC	0.346
CO	0.692
NO <sub>x</sub>	0.823
Manganese	0.179
Combination HAPs	0.198

- (a) This existing source is not a major stationary source because no attainment 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. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) The emissions calculations above are based on pages 1 through 11 of Appendix A of this document and as shown on page 11 of Appendix A.

### Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit where applicable):

Pollutant	PM (ton/yr)	PM <sub>10</sub> (ton/yr)	SO <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)
Proposed Modification	0.406	0.520	0.012	1.64	1.68	2.00
PSD Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD major source levels. 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 existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 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 is the first air approval issued to this source.

### Federal Rule Applicability

- (a) The eight (8) natural gas-fired space heaters, identified as H1 through H8, are not steam generating units. Therefore, the requirements of 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, and Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, are not included in the permit.
- (b) There are no other New Source Performance Standards included in the permit for this source.
- (c) The two (2) parts washers, identified as SK1 and SK2, and the one (1) natural gas-fired parts washer, identified as W, do not use halogenated solvents. Therefore, the requirements of the National Emission Standard for Hazardous Air Pollutants, 40 CFR 63, Subpart T, National Emission Standards for Halogenated Solvent Cleaning, are not included in the permit.
- (d) This source is an area source for HAPs. Therefore, the requirements of the National Emission Standard for Hazardous Air Pollutants, 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.

- (e) This source is an area source for HAPs. Therefore, the requirements of the National Emission Standard for Hazardous Air Pollutants, 40 CFR 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, are not included in the permit.
- (f) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) included in the permit for this source.

### **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 2-4.1-1 (New source toxics control)**

The operation of this 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 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 Emissions Limitations)**

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

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

This source was constructed in 1971. Therefore, pursuant to 326 IAC 6-5-1(b), the requirements of 326 IAC 6-5 are not applicable.

### State Rule Applicability – Individual Facilities

#### 326 IAC 6-2-3 (Particulate Emissions for Sources of Indirect Heating)

The eight (8) natural gas-fired space heaters, identified as H1 through H8, are not sources of indirect heating. Therefore, the requirements of 326 IAC 6-2-3, Particulate Emissions for Sources of Indirect Heating, are not applicable.

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

- (a) Pursuant to 326 IAC 6-3-2(e)(2), the allowable PM emission rate from the one (1) powder coating spray booth, identified as PC, which has a process weight rate of 7,031.25 pounds per hour shall not exceed 9.52 pounds per hour.

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

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

The one (1) powder coating spray booth, identified as PC, is controlled by a dry particulate filter. The PM emissions for the one (1) powder coating spray booth after control by the dry particulate filter are 0.084 pounds per hour. Therefore, the one (1) powder coating spray booth, controlled by a dry particulate filter, can comply with this rule.

- (b) The four (4) metal inert gas (MIG) welding stations, identified as MIG, consume less than 625 pounds of weld wire or rod per day, total. Therefore, pursuant to 326 IAC 6-3-1(b)(9), the four (4) metal inert gas (MIG) welding stations, identified as MIG, are exempt from the requirements of 326 IAC 6-3-2.
- (c) The potential particulate emissions from the one (1) laser cutting table, identified as L, the four (4) spot welding stations, identified as SW, the one (1) hand grinding station, identified as HG, the three (3) Tool and Die Shop bench grinders, identified as BG, the one (1) Tool and Die Shop abrasive blast cabinet, identified as SB1, and the one (1) maintenance abrasive blast cabinet, identified as SB2, are less than 0.551 pounds per hour, each. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the one (1) laser cutting table, identified as L, the four (4) spot welding stations, identified as SW, the one (1) hand grinding station, identified as HG, the three (3) Tool and Die Shop bench grinders, the one (1) Tool and Die Shop abrasive blast cabinet, identified as SB1, and the one (1) maintenance abrasive blast cabinet, identified as SB2, are exempt from the requirements of 326 IAC 6-3-2.

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

None of the facilities at the source have potential VOC emissions greater than twenty-five (25.0) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

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

The one (1) powder coating booth, identified as PC, and the one (1) natural gas-fired powder coating baking oven, identified as O2, have potential, and thus actual, VOC emissions of less than fifteen (15.0) pounds per day and less than twenty-five (25.0) tons per year. Therefore,

pursuant to 326 IAC 8-2-1(a)(4), the requirements of 326 IAC 8-2-9, Miscellaneous Metal Coating, are not applicable.

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

- (a) The one (1) natural gas-fired washer, identified as W, does not use an organic solvent to wash steel parts. Therefore, the requirements of 326 IAC 8-3-2, Cold Cleaner Operation, are not applicable.
- (b) The two (2) parts washers, identified as SK1 and SK2, were constructed in 2002. Therefore, they are subject to 326 IAC 8-3-2, Cold Cleaner Operation, for cold cleaning operations constructed after January 1, 1980. Pursuant to 326 IAC 8-3-2, the owner or operator shall:
  - (1) equip the cleaner with a cover;
  - (2) equip the cleaner with a facility for draining cleaned parts;
  - (3) close the degreaser cover whenever parts are not being handled in the cleaner;
  - (4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
  - (5) provide a permanent, conspicuous label summarizing the operating requirements; and
  - (6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold cleaner degreaser operation and control)

- (a) The one (1) natural gas-fired washer, identified as W, does not use an organic solvent to wash steel parts. Therefore, the requirements of 326 IAC 8-3-5, Cold cleaner degreaser operation and control, are not applicable.
- (b) The two (2) parts washers, identified as SK1 and SK2, were constructed after July 1, 1990 and do not have remote solvent reservoirs. Therefore, pursuant to 326 IAC 8-3-1(b)(2), the requirements of 326 IAC 8-3-5 (Cold cleaner degreaser operations and control) are applicable.
  - (1) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
    - (A) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
      - (i) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
      - (ii) The solvent is agitated; or

- (iii) The solvent is heated.
  - (B) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (C) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (D) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (E) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (2) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (A) Close the cover whenever articles are not being handled in the degreaser.
  - (B) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (C) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

## 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.

There are no Compliance Monitoring Requirements applicable to the source.

## Conclusion

The construction and operation of this tool and die manufacturing source shall be subject to the conditions of the **New Source Construction and Minor Source Operating Permit 069-23851-00074**.

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

**Company Name: M & S Industrial Metal Fabricators, Inc.  
Address City IN Zip: 5 Commercial Road, Huntington, Indiana 46750  
MSOP: 069-23851-00074  
Plt ID: 069-00074  
Reviewer: Michael A. Morrone  
Application Date: November 3, 2006**

**Surface Coating (PC)**

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
WF White GX-7-4	13.4	0.00%	0.00%	0.00%	0.00%	100%	0.020	125	0.00	0.00	0.00	0.00	0.00	36.8	0.00	75%
<b>Add worst case coating to all solvents</b>										PM Control Efficiency: 99.00%						
										<b>Uncontrolled</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>36.8</b>		
										<b>Controlled</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.368</b>		

**METHODOLOGY**

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

**Baking Oven (O2)**

Material	Powder usage rate (lbs/hr)	VOC Emission rate	VOC emissions (lbs/hr)	VOC emissions (tons/yr)
Uncured baking powder	31.25	1.00%	0.313	1.37

**METHODOLOGY**

VOC Emissions (tons/yr) = (Powder usage rate) \* 0.01 \*4.38

Potential VOC emissions from the curing of powder coating on steel parts is based on a Research Triangle Institute study reporting 1% VOC emissions from curing of powder coating.([http://cage.rti.org/altern\\_data.cfm?id=powder&cat=enviro](http://cage.rti.org/altern_data.cfm?id=powder&cat=enviro))  
 This is a conservative method since no VOCs are contained in the coating itself based on the MSDS.

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

**Company Name: M & S Industrial Metal Fabricators, Inc.  
Address City IN Zip: 5 Commercial Road, Huntington, Indiana 46750  
MSOP: 069-23851-00074  
Plt ID: 069-00074  
Reviewer: Michael A. Morrone  
Application Date: November 3, 2006**

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

\*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
<b>Existing Source</b>								
Seven (7) natural gas-fired space heaters, identified as H1 through H7	1.88	16.5	0.016	0.063	0.005	0.823	0.045	0.692
<b>Total</b>	<b>1.88</b>	<b>16.5</b>	<b>0.016</b>	<b>0.063</b>	<b>0.005</b>	<b>0.823</b>	<b>0.045</b>	<b>0.692</b>

Equipment	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Potential Emission in tons/yr					
			PM*	PM10*	SO2	NOx	VOC	CO
<b>New Equipment</b>								
One (1) natural gas-fired space heater, identified as H8	0.175	1.53	0.001	0.006	0.0005	0.077	0.004	0.064
One (1) natural gas-fired washer, identified as W	2.00	17.5	0.017	0.067	0.005	0.876	0.048	0.736
One (1) natural gas-fired drying oven, identified as O1	1.20	10.5	0.010	0.040	0.003	0.526	0.029	0.442
One (1) natural gas-fired powder baking oven, identified as O2	1.20	10.5	0.010	0.040	0.003	0.526	0.029	0.442
<b>Total</b>	<b>4.58</b>	<b>40.1</b>	<b>0.038</b>	<b>0.152</b>	<b>0.012</b>	<b>2.00</b>	<b>0.110</b>	<b>1.68</b>

**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 3 for HAPs emissions calculations.

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

**Company Name: M & S Industrial Metal Fabricators, Inc.  
Address City IN Zip: 5 Commercial Road, Huntington, Indiana 46750  
MSOP: 069-23851-00074  
Plt ID: 069-00074  
Reviewer: Michael A. Morrone  
Application Date: November 3, 2006**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 0.0021	Dichlorobenzene 0.0012	Formaldehyde 0.0750	Hexane 1.8000	Toluene 0.0034
Potential Emission in tons/yr (existing source)	0.00002	0.00001	0.001	0.015	0.00003
Potential Emission in tons/yr (new equipment)	0.00004	0.00002	0.002	0.036	0.0001

HAPs - Metals

Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.0004	Nickel 0.0021	Total HAPs
Potential Emission in tons/yr (existing source)	0.000004	0.00001	0.00001	0.00000	0.0000	<b>0.016</b>
Potential Emissions in tons/yr (new equipment)	0.00001	0.00002	0.00003	0.00001	0.00004	<b>0.038</b>
					<b>Total</b>	<b>0.053</b>

Methodology is the same as page 2.

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: M & S Industrial Metal Fabricators, Inc.  
Address City IN Zip: 5 Commercial Road, Huntington, Indiana 46750  
MSOP: 069-23851-00074  
Plt ID: 069-00074  
Reviewer: Michael A. Morrone  
Application Date: November 3, 2006**

PROCESS	Number of Stations	Max. electrode or carbon steel consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode or carbon steel)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
WELDING												
Metal Inert Gas (MIG)(carbon steel)	4	0.300	0.0055	0.0005		<b>Uncontrolled</b>	0.007	0.001	0.000	0.00	0.001	
						<b>Controlled</b>	0.0001					
Resistance (spot) welding	4	20.0	0.0055	0.0005		<b>Uncontrolled</b>	0.440	0.040	0.000	#VALUE!	0.040	
						<b>Controlled</b>	0.004					
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Plasma** (Laser Cutting Table)	1	0.370	787	0.0039			<b>Uncontrolled</b>	0.184	0.00	0.00	0.00	0.00
							<b>Controlled</b>	0.002				
<b>EMISSION TOTALS</b>												
Potential Emissions lbs/hr							<b>Uncontrolled</b>	0.631	0.041	0.00	0.00	0.041
							<b>Controlled</b>	0.006				
Potential Emissions lbs/day							<b>Uncontrolled</b>	15.1	0.97	0.00	0.00	0.974
							<b>Controlled</b>	0.151				
Potential Emissions tons/year							<b>Uncontrolled</b>	2.76	0.178	0.00	0.00	0.178
							<b>Controlled</b>	<b>0.028</b>				

METHODOLOGY

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

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

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

For the spot welders, an equivalency to pounds of electrode per hour consumed was made by assuming that this process is similar to MIG welding and that half of the process weight rate of 160 pounds of carbon steel per hour moves through the spot welders. This yields a mass of carbon steel consumed of 20 pounds per hour.

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" 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: Emission Calculations  
Solvent Degreasing**

**Company Name: M & S Industrial Metal Fabricators, Inc.**  
**Address City IN Zip: 5 Commercial Road, Huntington, Indiana 46750**  
**MSOP: 069-23851-00074**  
**Plt ID: 069-00074**  
**Reviewer: Michael A. Morrone**  
**Date: November 3, 2006**

Material	Usage (gal/day)	Density (lbs/gal)	Volume % VOC	Weight % VOC	Weight % Diethylene Glycol	VOC Emissions (tons/yr)	Diethylene Glycol Emissions (tons/yr)	Total HAPs (tons/yr)
<b>Cold Cleaner Degreaser</b>								
Safety-Kleen Premium Solvent	0.250	6.60	100%	100%	0.00%	0.301	0.00	0.00
<b>Natural gas-fired washer</b>								
Phos Kote 4023	0.750	9.75	12.0%	12.0%	1.00%	0.160	0.013	0.013

**Methodology**

VOC emissions (tons/yr) = Usage (gal/day) x Density (lbs/gal) x Weight % VOC x 365 days/yr / 2,000 lbs/ton  
HAPs emissions (tons/yr) = Usage (gal/day) x Density (lbs/gal) x Weight % HAP x 365 days/yr / 2,000 lbs/ton

Company Name: M & S Industrial Metal Fabricators, Inc.  
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MSOP: 069-23851-00074  
Plt ID: 069-00074  
Reviewer: Michael A. Morrone  
Application Date: November 3, 2006

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Glass Beads	155

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)

FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =

D = Density of abrasive (lb/ft3) From Table 2 =

D1 = Density of sand (lb/ft3) =

ID = Actual nozzle internal diameter for SB1 (in) =

ID2 = Actual nozzle internal diameter for SB2 (in) =

ID1 = Nozzle internal diameter (in) from Table 3 =

28
155
99
0.09
0.12
0.13

Flow Rate (FR) for SB1 (lb/hr) = 21.0 per nozzle

Flow Rate (FR) for SB2 (lb/hr) = 37.4 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =

FR = Flow Rate for SB1 (lb/hr) =

FR = Flow Rate for SB2 (lb/hr) =

w = fraction of time of wet blasting =

N = number of nozzles =

0.010
21.0
37.4
0 %
1

Uncontrolled Emissions for SB1 =	0.210 lb/hr
	0.920 ton/yr
Uncontrolled Emissions for SB 2 =	0.374 lb/hr
	1.64 ton/yr
Controlled Emissions for SB1	0.002 lb/hr
	0.009 ton/yr
Controlled Emissions for SB2	0.004 lb/hr
	0.016 ton/yr

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. 1, Section 3 "Abrasive Blasting" (1991 edition)

Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs

Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)2 x (D/D1)

E = EF x FR x (1-w/200) x N

w should be entered in as a whole number (if w is 50%, enter 50)

**Appendix A: Emission Calculations  
Grinding**

**Company Name: M & S Industrial Metal Fabricators, Inc.**  
**Address City IN Zip: 5 Commercial Road, Huntington, Indiana 46750**  
**MSOP: 069-23851-00074**  
**Plt ID: 069-00074**  
**Reviewer: Michael A. Morrone**  
**Application Date: November 3, 2006**

Process:	Rate (tons iron/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Type of control	Control Efficiency (%)	Eac (ton/yr)
One (1) hand grinder, identified as HG  <i>Source of Criteria</i> <i>Pollutant Factors:</i> <i>FIRE 6.01</i> <i>SCC# 3-04-003-40</i> <i>AP-42 Ch. 12.10</i> <i>Fifth edition 1995</i>	0.016	PM	17.0	1.19	None	0.00%	1.19
		PM-10	1.70	0.119			0.119
		chromium	0.006	0.0005			0.0005
		cobalt	0.001	0.00004			0.00004
		nickel	0.011	0.001			0.001
		arsenic	0.002	0.0002			0.0002
		cadmium	0.001	0.0001			0.0001
		selenium	0.0002	0.00001			0.00001
		Lead	0.005	0.0003			0.0003
Process:	Rate (tons iron/hr)	Pollutant	Ef (lb/ton produced)	Ebc (ton/yr)	Type of control	Control Efficiency (%)	Eac (ton/yr)
Three (3) bench grinders, identified as BG  <i>Source of Criteria</i> <i>Pollutant Factors:</i> <i>FIRE 6.01</i> <i>SCC# 3-04-003-40</i> <i>AP-42 Ch. 12.10</i> <i>Fifth edition 1995</i>	0.0015	PM	17.0	0.112	Cartridge Filter, DC 3	99.0%	0.001
		PM-10	1.70	0.011			0.0001
		chromium	0.006	0.00004			0.0000004
		cobalt	0.001	0.000003			0.00000003
		nickel	0.011	0.0001			0.000001
		arsenic	0.002	0.00001			0.0000001
		cadmium	0.001	0.00001			0.0000001
		selenium	0.0002	0.000001			0.00000001
		Lead	0.005	0.00003			0.0000003

**Appendix A: Emissions Calculations  
Unpaved Roads**

**Company Name: M & S Industrial Metal Fabricators, Inc.  
Address City IN Zip: 5 Commercial Road, Huntington, Indiana 46750  
MSOP: 069-23851-00074  
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Application Date: November 3, 2006**

<b>1.00</b>	trips/hr x
<b>0.10</b>	miles/roundtrip x

**876.0** miles per year

<b>Constants</b>			
where:	<b>For PM</b>	<b>For PM-10</b>	
k =	10.0	2.60	(particle size multiplier for PM-10) (k=10 for PM-30 or TSP)
s =	13.0	13.0	mean % silt content of unpaved roads
b =	0.500	0.400	Constant for PM-10 (b = 0.5 for PM-30 or TSP)
c =	0.400	0.300	Constant for PM-10 (c = 0.4 for PM-30 or TSP)
W =	17.0	17.0	tons average vehicle weight
Mdry =	0.200	0.200	surface material moisture content, % (default is 0.2 for dry conditions)
p =	125	125	number of days with at least 0.254mm of precipitation (See Figure 13.2.2-1)
<b>Particulate Emission Factor</b>			
Ef =	16.7	3.65	$Ef = \{k^*[(s/12)^{0.8}]^*[(W/3)^b]/[(Mdry/0.2)^c]\}^*[(365-p)/365]$ (lb/mile)

**PM Emissions =**  $\frac{16.7 \text{ lb/mi} \times 876 \text{ mi/yr}}{2000 \text{ lb/ton}}$

<b>7.31 tons/yr</b>
---------------------

**PM-10 Emissions =**  $\frac{3.65 \text{ lb/mi} \times 876 \text{ mi/yr}}{2000 \text{ lb/ton}}$

<b>1.60 tons/yr</b>
---------------------

The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads, based on 8760 hours of use and AP-42, Ch 11.2.1.

**Appendix A: Emissions Calculations  
Summary**

**Company Name: M & S Industrial Metal Fabricators, Inc.  
Address City IN Zip: 5 Commercial Road, Huntington, Indiana 46750  
MSOP: 069-23851-00074  
Plt ID: 069-00074  
Reviewer: Michael A. Morrone  
Application Date: November 3, 2006**

**Summary of Emissions**

**Uncontrolled Potential Emissions**

<b>Significant Emission Units</b>	<b>PM</b> (tons/yr)	<b>PM-10</b> (tons/yr)	<b>SO2</b> (tons/yr)	<b>NOx</b> (tons/yr)	<b>VOC</b> (tons/yr)	<b>CO</b> (tons/yr)	<b>Diethylene Glycol</b> (tons/yr)	<b>Lead</b> (tons/yr)	<b>Benzene</b> (tons/yr)	<b>Dichlorobenzene</b> (tons/yr)	<b>Formaldehyde</b> (tons/yr)	<b>Hexane</b> (tons/yr)	<b>Toluene</b> (tons/yr)	<b>Cadmium</b> (tons/yr)	<b>Chromium</b> (tons/yr)	<b>Manganese</b> (tons/yr)	<b>Nickel</b> (tons/yr)	<b>Total HAPs</b> (tons/yr)
<b>New Equipment</b>																		
One (1) Powder Coating spray booth, identified as PC	36.8	36.8	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) natural gas-fired washer identified as W	0.017	0.067	0.005	0.876	0.208	0.736	0.013	0.00001	0.00004	0.00002	0.002	0.036	0.0001	0.00002	0.00003	0.00001	0.00004	0.051
One (1) natural gas-fired oven dryer, identified as O1	0.010	0.040	0.003	0.526	0.029	0.442	0.000											
One (1) natural gas-fired powder baking oven, identified as O2	0.010	0.040	0.003	0.526	1.40	0.442	0.000											
One (1) natural gas-fired space heater, identified as H8	0.001	0.006	0.000	0.077	0.004	0.064	0.000	0.00001	0.00004	0.00002	0.002	0.036	0.0001	0.00002	0.00003	0.00001	0.00004	0.051
<b>Subtotal</b>	<b>36.8</b>	<b>36.9</b>	<b>0.012</b>	<b>2.00</b>	<b>1.64</b>	<b>1.68</b>	<b>0.013</b>	<b>0.00001</b>	<b>0.00004</b>	<b>0.00002</b>	<b>0.002</b>	<b>0.036</b>	<b>0.0001</b>	<b>0.00002</b>	<b>0.00003</b>	<b>0.00001</b>	<b>0.00004</b>	<b>0.051</b>
<b>Existing Source</b>																		
One (1) Laser cutting table, identified as L	0.810	0.810	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Four (4) spot welding stations, identified as SW	1.93	1.93	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.175	0.00	0.175
welding stations, identified as MIG	0.030	0.030	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.004	0.00	0.004
One (1) hand grinding station, identified as HG	1.19	0.119	0.00	0.00	0.00	0.00	0.00	0.0003	0.00	0.00	0.00	0.00	0.00	0.0001	0.0005	0.00	0.001	0.002
One (1) Tool and Die Shop abrasive blast cabinet, identified as SB1	0.920	0.920	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) maintenance abrasive blast cabinet, identified as SB2	1.64	1.64	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
bench grinders, identified as BG	0.112	0.011	0.00	0.00	0.00	0.00	0.00	0.000	0.00	0.00	0.00	0.00	0.00	0.0001	0.000	0.000	0.001	0.002
Seven (7) natural gas-fired space heaters, identified as H1 through H7	0.016	0.063	0.0049	0.823	0.045	0.692	0.00	0.000004	0.00002	0.00001	0.001	0.015	0.00003	0.00001	0.00001	0.000003	0.00002	0.016
Two (2) parts washers, identified as SK1 and SK2	0.00	0.00	0.00	0.00	0.301	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unpaved Roads	7.31	1.60	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Subtotal</b>	<b>14.0</b>	<b>7.12</b>	<b>0.005</b>	<b>0.823</b>	<b>0.346</b>	<b>0.692</b>	<b>0.00</b>	<b>0.0006</b>	<b>0.00002</b>	<b>0.00001</b>	<b>0.001</b>	<b>0.015</b>	<b>0.00003</b>	<b>0.00002</b>	<b>0.001</b>	<b>0.179</b>	<b>0.002</b>	<b>0.198</b>
<b>Total</b>	<b>50.8</b>	<b>44.0</b>	<b>0.017</b>	<b>2.83</b>	<b>1.99</b>	<b>2.37</b>	<b>0.013</b>	<b>0.0006</b>	<b>0.0001</b>	<b>0.00003</b>	<b>0.002</b>	<b>0.051</b>	<b>0.0001</b>	<b>0.0002</b>	<b>0.001</b>	<b>0.179</b>	<b>0.002</b>	<b>0.249</b>

Company Name: M & S Industrial Metal Fabricators, Inc.  
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Application Date: November 3, 2006

## Controlled Potential Emissions

Significant Emission Units	PM (tons/yr)	PM-10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Diethylene Glycol (tons/yr)	Lead (tons/yr)	Benzene (tons/yr)	Dichlorobenzene (tons/yr)	Formaldehyde (tons/yr)	Hexane (tons/yr)	Toluene (tons/yr)	Cadmium (tons/yr)	Chromium (tons/yr)	Manganese (tons/yr)	Nickel (tons/yr)	Total HAPs (tons/yr)
<b>New Equipment</b>																		
One (1) Powder Coating spray booth, identified as PC	0.368	0.368	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) natural gas-fired washer identified as W	0.017	0.067	0.005	0.876	0.208	0.736	0.013	0.00001	0.00004	0.00002	0.002	0.036	0.0001	0.00002	0.00003	0.00001	0.00004	0.051
One (1) natural gas-fired oven dryer, identified as O1	0.010	0.040	0.003	0.526	0.029	0.442	0.000											
One (1) natural gas-fired powder baking oven, identified as O2	0.010	0.040	0.003	0.526	1.40	0.442	0.000											
One (1) natural gas-fired space heater, identified as H8	0.001	0.006	0.000	0.077	0.004	0.064	0.000	0.00001	0.00004	0.00002	0.002	0.036	0.0001	0.00002	0.00003	0.00001	0.00004	0.051
<b>Subtotal</b>	<b>0.406</b>	<b>0.520</b>	<b>0.012</b>	<b>2.00</b>	<b>1.64</b>	<b>1.68</b>	<b>0.013</b>	<b>0.00001</b>	<b>0.00004</b>	<b>0.00002</b>	<b>0.002</b>	<b>0.036</b>	<b>0.0001</b>	<b>0.00002</b>	<b>0.00003</b>	<b>0.00001</b>	<b>0.00004</b>	<b>0.051</b>
<b>Existing Source</b>																		
One (1) Laser cutting table, identified as L	0.008	0.008	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Four (4) spot welding stations, identified as SW	0.019	0.019	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.175	0.00	0.175
welding stations, identified as MIG	0.0003	0.0003	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.004	0.00	0.004
One (1) hand grinding station, identified as HG	1.19	0.119	0.00	0.00	0.00	0.00	0.00	0.0003	0.00	0.00	0.00	0.00	0.00	0.0001	0.0005	0.00	0.0008	0.002
One (1) Tool and Die Shop abrasive blast cabinet, identified as SB1	0.0092	0.0092	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) maintenance abrasive blast cabinet, identified as SB2	0.082	0.082	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
bench grinders, identified as BG	0.001	0.0001	0.00	0.00	0.00	0.00	0.00	0.000	0.00	0.00	0.00	0.00	0.00	0.00007	0.0005	0.00	0.0008	0.002
Seven (7) natural gas-fired space heaters, identified as H1 through H7	0.016	0.063	0.005	0.823	0.045	0.692	0.000	0.000004	0.00002	0.00001	0.001	0.015	0.00003	0.00001	0.00001	0.000003	0.00002	0.016
Two (2) parts washers, identified as SK1 and SK2	0.00	0.00	0.00	0.000	0.301	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unpaved Roads	7.31	1.60	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Subtotal</b>	<b>8.64</b>	<b>1.90</b>	<b>0.005</b>	<b>0.823</b>	<b>0.346</b>	<b>0.692</b>	<b>0.00</b>	<b>0.001</b>	<b>0.00002</b>	<b>0.00001</b>	<b>0.001</b>	<b>0.015</b>	<b>0.00003</b>	<b>0.0002</b>	<b>0.001</b>	<b>0.179</b>	<b>0.002</b>	<b>0.198</b>
<b>Total</b>	<b>9.04</b>	<b>2.42</b>	<b>0.017</b>	<b>2.83</b>	<b>1.99</b>	<b>2.37</b>	<b>0.013</b>	<b>0.001</b>	<b>0.0001</b>	<b>0.00003</b>	<b>0.002</b>	<b>0.051</b>	<b>0.0001</b>	<b>0.0002</b>	<b>0.001</b>	<b>0.179</b>	<b>0.002</b>	<b>0.249</b>

Company Name: M & S Industrial Metal Fabricators, Inc.  
Address City IN Zip: 5 Commercial Road, Huntington, Indiana 46750  
MSOP: 069-23851-00074  
Plt ID: 069-00074  
Reviewer: Michael A. Morrone  
Application Date: November 3, 2006

Limited Potential to Emit

Significant Emission Units	PM (tons/yr)	PM-10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Diethylene Glycol (tons/yr)	Lead (tons/yr)	Benzene (tons/yr)	Dichlorobenzene (tons/yr)	Formaldehyde (tons/yr)	Hexane (tons/yr)	Toluene (tons/yr)	Cadmium (tons/yr)	Chromium (tons/yr)	Manganese (tons/yr)	Nickel (tons/yr)	Total HAPs (tons/yr)
<b>New Equipment</b>																		
One (1) Powder Coating spray booth, identified as PC	0.368	0.368	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) natural gas-fired washer identified as W	0.017	0.067	0.005	0.876	0.208	0.736	0.013	0.00001	0.0000	0.00002	0.002	0.036	0.0001	0.00002	0.00003	0.00001	0.0000	0.051
One (1) natural gas-fired oven dryer, identified as O1	0.010	0.040	0.003	0.526	0.029	0.442	0.000											
One (1) natural gas-fired powder baking oven, identified as O2	0.010	0.040	0.003	0.526	1.40	0.442	0.000											
One (1) natural gas-fired space heater, identified as H8	0.001	0.006	0.000	0.077	0.004	0.064	0.000											
<b>Subtotal</b>	<b>0.406</b>	<b>0.520</b>	<b>0.012</b>	<b>2.00</b>	<b>1.64</b>	<b>1.68</b>	<b>0.013</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.002</b>	<b>0.036</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.051</b>
<b>Existing Source</b>																		
One (1) Laser cutting table, identified as L	0.810	0.810	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Four (4) spot welding stations, identified as SW	1.93	1.93	0.00	0.00	0.00	0.00	0.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.175	0.00	0.175
welding stations, identified as MIG	0.030	0.030	0.00	0.00	0.00	0.00	0.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.004	0.00	0.004
One (1) hand grinding station, identified as HG	1.19	0.119	0.00	0.00	0.00	0.00	0.000	0.000	0.00	0.00	0.00	0.00	0.00	0.00007	0.0005	0.00	0.0008	0.002
One (1) Tool and Die Shop abrasive blast cabinet, identified as SB1	0.920	0.920	0.00	0.00	0.00	0.00	0.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
One (1) maintenance abrasive blast cabinet, identified as SB2	1.64	1.64	0.00	0.00	0.00	0.00	0.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
bench grinders, identified as BG	0.112	0.011	0.00	0.00	0.00	0.00	0.000	0.00003	0.00	0.00	0.00	0.00	0.00	0.00001	0.0005	0.00	0.001	0.002
Seven (7) natural gas-fired space heaters, identified as H1 through H7	0.016	0.063	0.005	0.823	0.045	0.692	0.000	0.000004	0.00002	0.000	0.001	0.015	0.00003	0.00001	0.00001	0.000003	0.00002	0.016
Two (2) parts washers, identified as SK1 and SK2	0.00	0.00	0.00	0.00	0.30	0.00	0.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Unpaved Roads	7.31	1.60	0.00	0.00	0.00	0.00	0.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Subtotal</b>	<b>14.0</b>	<b>7.12</b>	<b>0.005</b>	<b>0.823</b>	<b>0.346</b>	<b>0.692</b>	<b>0.00</b>	<b>0.001</b>	<b>0.00002</b>	<b>0.00001</b>	<b>0.001</b>	<b>0.015</b>	<b>0.00003</b>	<b>0.0002</b>	<b>0.001</b>	<b>0.179</b>	<b>0.002</b>	<b>0.198</b>
<b>Total</b>	<b>14.4</b>	<b>7.64</b>	<b>0.017</b>	<b>2.83</b>	<b>1.99</b>	<b>2.37</b>	<b>0.013</b>	<b>0.001</b>	<b>0.0001</b>	<b>0.00003</b>	<b>0.002</b>	<b>0.051</b>	<b>0.0001</b>	<b>0.0002</b>	<b>0.001</b>	<b>0.179</b>	<b>0.002</b>	<b>0.249</b>