



TO: Interested Parties / Applicant

RE: Specialty Coating Systems / 097-24045-00597

FROM: Felicia A. Robinson  
Administrator  
City of Indianapolis  
Office of Environmental Services

## Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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 Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



Air Quality Hotline: 317-327-4AIR | [knozone.com](http://knozone.com)

Department of Public Works  
Office of Environmental Services

2700 Belmont Avenue  
Indianapolis, IN 46221

317-327-2234  
Fax 327-2274  
TDD 327-5186  
[indygov.org/dpw](http://indygov.org/dpw)

CERTIFIED MAIL 7000 0600 0023 5187 0526

March 22, 2007

Mr. Scott Trask  
Specialty Coating Systems  
7645 Woodland Drive  
Indianapolis, IN 46278



RE: Exempt Construction and Operation Status  
097-24045-00597

Dear Mr. Trask:

The application from Specialty Coating Systems, received by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis, Office of Environmental Services (OES) on December 6, 2006, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following parylene coating operation, located at 7645 Woodland Drive, Indianapolis, Indiana, 46278, is classified as exempt from air pollution permit requirements.

The source consists of the following processes / equipment:

- (1) Parts Cleaning and Preparation, consisting of two parts cleaners (utilizing a mixture of 75% isopropyl alcohol and 25% water) and a parts preparation process where some of the parts are pretreated with organosilane for adhesion promotion for the parylene coating process. This equipment was installed at the source in 2000.
- (2) Parylene Coating, which consists of various equipment for the coating of parts with either the parylene monomer or dimer. This is a dry film batch type coating process which utilizes gas-phase polymerization to coat the substrate. This equipment was installed in 2000.
- (3) Burn-off Oven, which is used to remove residual material from the quartz lined tubes used in the pyrolysis zone of the parylene coating process. This Burn-off Oven utilizes an electric oven to heat the parts to approximately 1100 °F. This equipment was installed at the source in 2000.
- (4) Natural Gas-fired Heaters, constructed at various times since 2000, with a combined heat input capacity of 3.655 MMBtu/hr, used for space heat throughout the facility.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitation), opacity shall meet the following:
  - (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.



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- (2) Pursuant to 326 IAC 8-3-1(a)(2), the parts cleaning operation is subject to requirements of 326 IAC 8-3-2 (Cold cleaner operation). The owner or operator of a cold cleaning facility 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.
  
- (3) Pursuant to 326 IAC 8-3-1(b)(1)(A), the parts cleaning operation is subject to requirements of 326 IAC 8-3-5 (Cold cleaner operation and control). The owner or operator of a cold cleaning facility shall:
  - (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (1) 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));
    - (2) the solvent is agitated; or
    - (3) 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) Equip the degreaser with a freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater, 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)).
  - (d) Provide a permanent, conspicuous label which lists the operating requirements outlined below.

- (e) The owner or operator of a cold cleaning facility 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.

An application or notification shall be submitted, in accordance with 326 IAC 2, to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions, please feel free to contact Jeffrey Hege at 317-327-2279.

Sincerely,

ORIGINAL SIGNED BY

Felicia A. Robinson  
Administrator  
Office of Environmental Services

FAR/jsh

cc: File  
Air Compliance – Matt Mosier  
IDEM, OAQ – Mindy Hahn  
Marion County Health Department

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
City Of Indianapolis Office of Environmental Services**

Technical Support Document (TSD) for an Exemption

**Source Background and Description**

<b>Source Name:</b>	Specialty Coating Systems
<b>Source Location:</b>	7645 Woodland Drive
<b>County:</b>	Marion
<b>SIC Code:</b>	3559 and 3999
<b>Exemption No.:</b>	E97-24045-00597
<b>Permit Reviewer:</b>	Jeffrey Hege

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed an application from Specialty Coating Systems relating to the parylene coating operation.

**Exempt Emission Units and Pollution Control Equipment**

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

- (1) Parts Cleaning and Preparation, consisting of two parts cleaners (utilizing a mixture of 75% isopropyl alcohol and 25% water) and a parts preparation process where some of the parts are pretreated with organosilane for adhesion promotion for the parylene coating process. This equipment was installed at the source in 2000.
- (2) Parylene Coating, which consists of various equipment for the coating of parts with either the parylene monomer or dimer. This is a dry film batch type coating process which utilizes gas-phase polymerization to coat the substrate. This equipment was installed in 2000.
- (3) Burn-off Oven, which is used to remove residual material from the quartz lined tubes used in the pyrolysis zone of the parylene coating process. This process utilizes an electric oven to heat the parts to approximately 1100 °F. This equipment was installed at the source in 2000.
- (4) Natural Gas-fired Heaters, constructed at various times since 2000, with a combined heat input capacity of 3.655 MMBtu/hr, used for space heat throughout the facility.

**Existing Approvals**

The source has no existing approvals.

**Enforcement Issues**

There are no enforcement actions pending. Pursuant to 326 IAC 2-1.1-3, this source is exempt from permitting requirements.

## Recommendation

The staff recommends to the Administrator that an exemption from air pollution permitting requirements be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the source's application received on December 6, 2006 and additional information received from the Source on March 1, 2007.

## Emission Calculations

See Appendix A (pages 1 through 4) of this document for detailed emission 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	0.03
PM-10	0.12
SO <sub>2</sub>	0.01
VOC	9.40
CO	1.35
NO <sub>x</sub>	1.60

HAPs	Potential to Emit (tons/yr)
Highest single HAP	0.029 (hexane)
Combination of HAPs	0.030

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

## County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	Attainment
PM2.5	Nonattainment
SO <sub>2</sub>	Maintenance attainment
NO <sub>x</sub>	Attainment
8-hour Ozone	Basic nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions, pursuant to the Non-attainment New Source Review requirements.
- (c) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revoking the one-hour ozone standard in Indiana.
- (e) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

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

Pollutant	Emissions (tons/yr)
PM	0.03
PM-10	0.12
SO <sub>2</sub>	0.01
VOC	9.40
CO	1.35
NO <sub>x</sub>	1.60
Single HAP	0.029
Combination HAPs	0.030

- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2 and 2-3, the PSD and Emission Offset requirements do not apply.

### Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,

- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This is the first air approval issued to this source.

### **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this exemption.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this exemption.
- (c) NESHAP 40 CFR Part 63, Subpart T (National Emission Standards for Halogenated Solvent Cleaning) is not included for this source because no halogenated HAP solvents (as defined in 40 CFR Part 63, §63.460(a)), are used in the degreasing operation. They use isopropyl alcohol.

### **State Rule Applicability - Entire Source**

#### 326 IAC 2-1.1-3 (Exemptions)

- (1) Parts Cleaning and Preparation, consisting of two parts cleaners (utilizing a mixture of 75% isopropyl alcohol and 25% water) and a parts preparation process where some of the parts are pretreated with organosilane for adhesion promotion for the parylene coating process. This equipment was installed at the source in 2000. Although these parts cleaners are subject to the provisions of 326 IAC 8, they are not required to utilize air pollution control equipment. Therefore, these processes are subject to 326 IAC 2-1.1-3(e)(1)(D), and since they emit less than ten (10) tons per year of volatile organic compounds (VOCs), they are exempt.
- (2) Parylene Coating, which consists of various equipment for the coating of parts with either the parylene monomer or dimer. This is a dry film batch type coating process which utilizes gas-phase polymerization to coat the substrate. This equipment was installed in 2000. Since this process emits less than ten (10) tons per year of volatile organic compounds (VOCs), less than one (1) ton per year of a single hazardous air pollutant (HAP) and two and one-half (2.5) tons per year of any combination of HAPs listed pursuant to Section 112(b) of the CAA, pursuant to 326 IAC 2-1.1-3(e)(1)(D) and (H) it is exempt.
- (3) Burn-off Oven, which is used to remove residual material from the quartz lined tubes used in the pyrolysis zone of the partlene coating process. This Burn-off Oven utilizes an electric oven to heat the parts to approximately 1100 °F. This equipment was installed at the source in 2000. Since this process emits less than ten (10) tons per year of volatile organic compounds (VOCs), less than one (1) ton per year of a single hazardous air pollutant (HAP) and two and one-half (2.5) tons per year of any combination of HAPs listed pursuant to Section 112(b) of the CAA, pursuant to 326 IAC 2-1.1-3(e)(1)(D) and (H) it is exempt.
- (4) Natural Gas-fired Heaters, constructed at various times since 2000, with a combined heat input capacity of 3.655 MMBtu/hr, used for space heat throughout the facility. Since these heaters are fired only by natural gas and have a heat input of less than 10 MMBtu/hr, then pursuant to 326 IAC 2-1.1-3(e)(5)(A)(i) they are exempt.

326 IAC 2-1.1-5 (Non-attainment New Source Review)

This source is not major under nonattainment NSR because it has the potential to emit less than 100 tons of PM<sub>10</sub> (as a surrogate for PM<sub>2.5</sub>) and ozone. Therefore, the Non-attainment New Source Review requirements are not applicable.

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

This source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

326 IAC 2-3 (Emission Offset)

This source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

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

This source is not a major source of HAPs, and will emit less than 10 tons per year of a single HAP and 25 tons per year of a combination of HAP; therefore, 326 IAC 2-4.1 does not apply.

326 IAC 5-1 (Opacity Limitations)

This source is located in Marion County. Therefore, pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

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

Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour are exempt from this rule. Therefore, this rule is not included in this Exemption.

326 IAC 8-2-1 (Surface Coating Emission Limitations)

Pursuant to 326 IAC 8-2-1(a)(2), even though the source was constructed after January 1, 1980, it does not have the potential to emit (PTE) of 25 tpy or greater of VOC, nor actual emission of 15 lb/day before add on controls. Therefore, this rule is not included in this Exemption.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

Pursuant to 326 IAC 8-3-1(a)(2), the parts cleaning operation is subject to requirements of 326 IAC 8-3-2 (Cold cleaner operation). The owner or operator of a cold cleaning facility 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.

Pursuant to 326 IAC 8-3-1(b)(1)(A), the parts cleaning operation (cold cleaners located in Marion County utilizing isopropyl alcohol / water mixture, constructed in 2000 and without a remote solvent reservoir) is subject to the requirements of 326 IAC 8-3-5 (Cold cleaner operation and control). The owner or operator of a cold cleaning facility shall:

- (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (1) 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));
  - (2) the solvent is agitated; or
  - (3) 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) Equip the degreaser with a freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater, 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)).
- (d) Provide a permanent, conspicuous label which lists the operating requirements outlined below.
- (e) The owner or operator of a cold cleaning facility 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.

## Conclusion

The construction and operation of this parylene coating operation shall be subject to the conditions of this Exemption No.: 097-24045-00597.