



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: December 27, 2007  
RE: Martin Yale Industries / 169-24993-00072  
FROM: Matthew Stuckey, Deputy Branch 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, Suite N 501E, 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.dot12/03/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

*Mitchell E. Daniels, Jr*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
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Indianapolis, Indiana 46204-2251  
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[www.IN.gov/idem](http://www.IN.gov/idem)

Tyler Bear  
Martin Yale Industries  
251 Wedcor Avenue  
Wabash, IN, 46992

December 27, 2007

Re: Exempt Construction and Operation Status,  
E169-24993-00072

Dear Mr. Tyler:

The application from Martin Yale Industries, received on July 02, 2007, 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 stationary office machines and equipment manufacturing plant, located at, 251 Wedcor Avenue, Wabash, In 46992, is classified as exempt from air pollution permit requirements:

- (a) One (1) spray paint booth, constructed in 2007, to paint office equipment, using a total of 0.0043 gallon paint per hour, exhausting to the indoors.
- (b) One (1) electrostatic powder coating booth, constructed in 2007, for surface coating office equipment, with a maximum coating rate of 10 pounds of powder coating per hour, with powder overspray collected by powder coating recovery system, with a control efficiency of 99%, exhausting to the indoors.
- (c) Twenty one (21) natural gas-fired space heaters/ovens, constructed in 2007, two (2) ovens rated at 1.5MMBtu/hr, one (1) oven rated at 2.5MMBtu/hour and eighteen (18) space heaters rated at 0.175 MMBtu/hour respectively, exhausting to the indoors.
- (d) One (1) TIG welder, constructed in 2007, with electrode consumption of one (1) pound per hour.

The following conditions shall be applicable:

- (a)
  - (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:
    - (2) 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.
    - (3) 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.
  - (b) 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, in a manner that would violate 326 IAC 6-4.

- (c) The powder coating recovery system shall be in operation at all times the powder coating booth is in operation.

This exemption is the first air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions on this matter, please contact Swarna Prabha, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-234-5376 or at 1-800-451-6027 (ext 45376).

Sincerely,



Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

IC/SP

cc: File - Wabash County  
Wabash County Health Department  
Air Compliance Section  
Permit Tracking  
Compliance Data Section  
Permits Administrative and Development  
Billing, Licensing and Training Section

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

**Technical Support Document (TSD) for an Exemption**

**Source Background and Description**

<b>Source Name:</b>	<b>Martin Yale Industries</b>
<b>Source Location:</b>	<b>251 Wedcor Avenue Wabash, IN 46992</b>
<b>County:</b>	<b>Wabash</b>
<b>SIC Code:</b>	<b>5044</b>
<b>Exemption No.:</b>	<b>169-24993-00072</b>
<b>Permit Reviewer:</b>	<b>Swarna Prabha</b>

On July 02, 2007, the Office of Air Quality (OAQ) received an application from Martin Yale Industries relating to the stationary office machines and equipment manufacturing plant.

**New Emission Units and Pollution Control Equipment**

The application includes information relating to the operation of the following new emission unit:

- (a) One (1) spray paint booth, constructed in 2007, to paint office equipment, using a total of 0.0043 gallon paint per hour, exhausting to the indoors.
- (b) One (1) electrostatic powder coating booth, constructed in 2007, for surface coating office equipment, with a maximum coating rate of 10 pounds of powder coating per hour, with powder overspray collected by powder coating recovery system, with a control efficiency of 99%, exhausting to the indoors.
- (c) Twenty one (21) natural gas-fired space heaters/ovens, constructed in 2007, two (2) ovens rated at 1.5MMBtu/hr, one (1) oven rated at 2.5MMBtu/hour and eighteen (18) space heaters rated at 0.175 MMBtu/hour respectively, exhausting to the indoors.
- (d) One (1) TIG welder, constructed in 2007, with electrode consumption of one (1) pound per hour.

**Existing Approvals**

No previous air approvals have been issued to this source.

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Commissioner that the application be approved as an exemption. 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.

### Emission Calculations

See Appendix A of this TSD for detailed emissions calculations (Appendix A, pages 2 of 2). These calculations were submitted by the source and have been verified.

### Potential To Emit

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

Pollutant	Potential To Emit (tons/year)
PM	0.59
PM-10	0.29
SO <sub>2</sub>	0.02
NO <sub>x</sub>	3.79
VOC	0.27
CO	3.18

HAPs	Potential To Emit (tons/year)
Ethylbenzene	0.003
Glycol Ether	0.002
Xylene	0.01
Manganese	negligible
Nickel	negligible
TOTAL HAPs	0.015

- (a) The PTE (as defined in 326 IAC 2-1.1-1(16)) of all regulated criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.
- (b) The PTE (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE 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.

### County Attainment Status

The source is located in Wabash County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</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 the ozone standard. Wabash County has been designated as attainment for ozone. Therefore, VOC emissions and NO<sub>x</sub> were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (b) Wabash 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 2.5 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 surrogate for PM<sub>2.5</sub> emissions. See the State Rule Applicability – Entire Source section.
- (c) Wabash County has been classified as attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

#### Source Status

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

Pollutant	Emissions (tons/yr)
PM	0.59
PM-10	0.29
SO <sub>2</sub>	0.02
NO <sub>x</sub>	3.79
VOC	0.27
CO	3.18
Single HAP	0.01
Combination HAPs	0.015

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

#### Part 70 Permit Determination

##### 326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the 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/year.

This status is based on the potential to emit calculations of the source (see Appendix A).

### **Federal Rule Applicability**

- (a) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in the exemption for this source.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the exemption for this source.

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

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

This source was constructed after the applicability date of August 7, 1977. However, it is not one of the 28 listed source categories defined in 326 IAC 2-2-1(gg)(1), no major modifications were done to this source, and the potential to emit of all attainment regulated pollutants is less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

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

The requirements of 326 IAC 2-4.1 are not applicable to this source, since the potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year.

#### 326 IAC 2-6 (Emission Reporting)

This source is not subject to the requirements of 326 IAC 2-6 (Emission Reporting), because it is located in Wabash County, it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year.

#### 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 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.

#### 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, in a manner that would violate 326 IAC 6-4.

### **State Rule Applicability – Natural Gas Combustion Sources**

#### 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

The natural gas-fired heaters are not subject to 326 IAC 6-2 as they are not sources of indirect heating.

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

Pursuant to 326 IAC 6-3-1(b)(14), the natural gas-fired heaters, are each exempt from the requirements of 326 IAC 6-3, because, pursuant to 326 IAC 1-2-59, liquid and gaseous fuels and combustion air are not considered as part of the process weight. In addition, each heater has a potential emissions less than five hundred fifty one thousandths (0.551) pound per hour.

**326 IAC 7-1 (Sulfur dioxide emission limitations: applicability)**

The natural gas-fired heaters, are each not subject to the requirements of 326 IAC 7-1, because the potential and the actual emissions are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively.

**326 IAC 8-2 (Surface Coatings Emissions Limitations)**

Pursuant to 326 IAC 8-2-1(a)(4) , The source is not subject to 326 IAC 8-2. The source has actual emissions of less than fifteen (15) pounds of VOC per day before add-on controls. No other Article 8 rules are applicable to this source.

**State Rule Applicability - TIG Welder**

**326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes)**

Pursuant to 326 IAC 6-3-1(b)(9), the welding operation is not subject to the requirements of 326 IAC 6-3-1(b)(9), because less than 625 pounds of wire is consumed per day.

**Conclusion**

The operation of this facility shall be subject to the conditions of the attached Exemption.  
No. 169-24993-00072

### Total Air Emissions for Martin Yale, Inc.

Appendix A: Emission Calculation  
 Company name: Martin Yale Industry  
 Address: 251 Weldon Avenue  
 Exemption # 169-24993-00072  
 Reviewer: S. Prabha

Potential Emissions in Tons/Year	PM	PM10	SO2	NOx	VOC	CO	HAPS
Permit Registration Thresholds in Tons/Year	5	5	10	10	10	25	25

#### Spray Paints

Paint	Density (lbs/gal)	Gallon paint per Hour	VOC (lbs/gal)	VOC %	VOC			Xylene		Hazardous Air Pollutants			Glycol Ether		
					Max (lbs/hr)	Max (lbs/day)	Max (tons/yr)	Max (lbs/hr)	Max (tons/yr)	Max (lbs/hr)	Max (tons/yr)	Max (lbs/hr)	Max (tons/yr)		
Colorplace Spray Enamel	6.76	0.002	3.92	42.79%	0.008	0.19	0.034								
05679-668970 6683 Telegray	6.71	0.0023			0.007	0.16	0.028	16%	0.002	0.01	5%	0.001	0.003	3%	0.0005
Totals							0.063			0.01		0.003			0.002

#### Powder Coating Process

Name of Coatings	Pounds Coating per Hour	Wt % Solids	Transfer Eff. %	Control Eff. %	Particulate Matter (PM)		
					Max (lbs/hr) Controlled	Max (tons/yr) Controlled	Max (tons/yr) Uncontrolled
Powders	10	100%	99%	99.93%	7E-05	0.0003486	0.498

Heat Input Capacity 5,688  
 (2-1.5, 1-2.5, and 1-0.175 MMBtu/hr  
 MMBtu/hr Ovens)

Potential Throughput 49,713 MMBtu/yr - Nat Gas

Emission Factor (lb/MMCF)	Pollutant						
	PM	PM10	SO2	NOx	VOC	CO	
Potential Emission (tons/yr)	1.9	7.6	0.6	100	5.5	84	2.1
	0.05	0.2	0.01	2.5	0.1		

\* Emission factor from AP-42, Fifth Edition, Volume 1, Chapter 12, Section 19

**Welding**

Process	Number of Stations	Electrode Consumption (lbs/hr)	Emission Factor (lb PM10/lb electrode)	PM Emissions (lbs/hr)	PM Emissions (tons/yr)
TIG Welder	1	1	0.0055	0.0055	0.0241

\* Emission factor from AP-42, Fifth Edition, Volume 1, Chapter 10, Section 19

**Space Heaters**

Heat Input Capacity 2.98  
 (17-0.175 MMBtu/hr Heaters)

Potential Throughput  
 MMBtu/hr 26.061  
 MMBtu/yr - Nat Gas

Emission Factor (lb/MMCF)	Pollutants					
	PM	PM10	SO2	NOX	VOC	CO
Potential Emission (tons/yr)	1.9	7.6	0.6	100	5.5	84
	0.02	0.1	0.01	1.3	0.1	1.1

\* Emission factor from AP-42, Fifth Edition, Volume 1, Chapter 12, Section 19

Appendix A: EMISSION CALCULATION  
 Company Name: Martin Yale  
 Address: 251 Weldon Avenue  
 Exemption 169-24993-00072  
 Reviewer: S. Prabha