



DATE: September 13, 2007
TO: Interested Parties / Applicant
RE: McBroom Electric Company Incorporated / E 097-25016-00240
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

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

September 13, 2007

Mr. Richard McBroom
McBroom Electric Company Incorporated
800 W. 16th
Indianapolis, IN 46202



Certified Mail: 7007 0710 0005 3966 0647

Dear Mr. McBroom:

Re: Exempt Construction and Operation Status,
E 097-25016-00240

The application from McBroom Electric Company Incorporated, received on July 6, 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 electric motor repair facility, located at 800 W. 16th, Indianapolis, Indiana, is classified as exempt from air pollution permit requirements:

- (a) One (1) surface coating station, identified as Unit 1, utilizing an air-assisted system, coating a maximum of 0.625 units per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack. Installed in January 1988.

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 Limitations), 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 15 minutes (60 readings) in a 6-hour period 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.
- (2) 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.

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 Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Felicia A. Robinson
Administrator

wmw

cc: Files
Air Compliance – Matt Mosier
IDEM, OAQ – Mindy Hahn



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Department of Public Works
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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	McBroom Electric Company Incorporated
Source Location:	800 W. 16th, Indianapolis, Indiana 46202
County:	Marion
SIC Code:	3629
Operation Permit No.:	E 097-25016-00240
Permit Reviewer:	Warner Myron Waters

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services (OES) have reviewed an application from McBroom Electric Company Incorporated relating to the construction and operation of an electric motor repair facility.

Exempt Emission Units and Pollution Control Equipment

The source consists of the following exempt emission units:

- (a) One (1) surface coating station, identified as Unit 1, utilizing an air-assisted system, coating a maximum of 0.625 units per hour, using dry filters for particulate matter overspray control, and exhausting to one (1) stack. Installed in January 1988.

Existing Approvals

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

McBroom Electric Company Incorporated was previously permitted under the City of Indianapolis local ordinances.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Administrator 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 received on July 6, 2007 with no additional information submitted by the applicant.

Emission Calculations

See Appendix A (page one of one) of this document for detailed emission calculations.

Potential to Emit 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	0.40
PM-10	0.40
SO ₂	Negligible
VOC	0.52
CO	Negligible
NO _x	Negligible

HAPs	Potential to Emit (tons/yr)
Any Single HAP	Negligible
Combination HAPs	Negligible

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of regulated air pollutants is 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 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	Unclassifiable
PM2.5	Nonattainment
SO ₂	Maintenance attainment
NO _x	Attainment
8-hour Ozone	Basic nonattainment
CO	Attainment
Lead	Unclassifiable

- (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 PM_{2.5} in 7FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM 2.5 emissions, it has directed states to regulate PM-10 emissions as a surrogate for PM_{2.5} 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 revision revoking the one-hour ozone standard in Indiana.

Source Status

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

Pollutant	Emissions (tons/yr)
PM	0.40
PM-10	0.40
SO ₂	Negligible
VOC	0.52
CO	Negligible
NO _x	Negligible
Single HAP	Negligible
Combination HAPs	Negligible

- (a) This new source is not a major stationary source under 326 IAC 2-2 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. This new source is not a major stationary source under 326 IAC 2-3 or 326 IAC 2-1.1-5 because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater. Therefore, pursuant to 326 IAC 2-2 and 326 IAC 2-3, the PSD, Emission Offset and, Non attainment New Source Review and requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

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

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

Federal Rule Applicability

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

State Rule Applicability – Entire Source

326 IAC 2-4.1 (Hazardous Air Pollutants)

The source is not subject to 326 IAC 2-4.1, because the source is not a major source of hazardous air pollutants, as defined in 40 CFR 63. The source will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1(a)(1), (2), and (3), this source is not subject to 326 IAC 2-6 (Emission Reporting) because, as an Exemption, it is not required to have an operating permit under 326 IAC 2-7, it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year, and it is not located in Lake or Porter Counties.

326 IAC 5-1 (Opacity Limitations)

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the surface coating process, not otherwise exempt in subdivisions (5) through (8) of this rule, uses less than 5 gallons of coatings per day. Therefore, 326 IAC 6-3-2 does not apply

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.

Conclusion

The construction and operation of this electric motor repair facility shall be subject to the conditions of the Exemption E097-25016-00240.

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

**Company Name: McBroom Electric Company Incorporated
Address City IN Zip: 800 W. 16th, Indianapolis, Indiana 46202
Permit Number: E 097-25016-00240
Reviewer: Warner Myron Waters
Date: 08-20-2007**

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
speed enamel	9.85	35.50%	0.0%	35.5%	0.0%	49.00%	0.02700	0.625	3.50	3.50	0.06	1.42	0.26	0.40	7.14	15%
xylene	7.26	0.00%	0.0%	100.0%	0.0%	0.00%	0.01333	0.625	7.26	7.26	0.06	1.45	0.26	0.00	N/A	N/A

State Potential Emissions as applied

0.12 2.87 0.52 0.40

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)