



DATE: March 3, 2008
TO: Interested Parties / Applicant
RE: Dickinson Fleet Services, LLC / R097-25171-00624
FROM: Timothy J. Method
Environmental Coordinator

Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

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 501, 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 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



March 3, 2008

Mr. Ted Dulaney
Operations Manager
Dickinson Fleet Services, LLC
4709 West 96th Street
Indianapolis, Indiana 46268

Certified Mail Number: 7007 0710 0005 3965 7401

Re: Registered Construction and Operation Status,
R097-25171-00624

Dear Mr. Dulaney:

The application from Dickinson Fleet Services, LLC received on August 20, 2007, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1, it has been determined that the following stationary truck repair facility located at 4709 West 96th Street, Indianapolis, Indiana 46268 is classified as registered:

- (a) One (1) blasting room, identified as emission unit Blast Room # 1, utilizing JetMag as the blasting media and consisting of one 7/16 inch blasting nozzle operating at one hundred twenty five (125) pounds per square inch pressure. The maximum hourly blasting media process rate is 0.39 tons per hour. Blast Room # 1 utilizes one (1) Wheelabrator pulse jet baghouse and two (2) dry filter cartridges for emissions control exhausting indoors. The one (1) Wheelabrator baghouse recirculates the JetMag blast media and is an integral part of Blast Room # 1 operations. Blast Room # 1 was constructed in 1999.
- (b) One (1) down draft paint spray booth, identified as emission unit Down Draft, utilizing HVLP paint spray guns, with a maximum surface coating capacity of 5.75 gallons of coating per unit and 0.0625 units per hour. Emission unit Down Draft utilizes dry filters for emissions control and exhausts indoors. Emission unit Down Draft was constructed in 1979.
- (c) One (1) up draft paint spray booth, identified as emission unit Up Draft, utilizing HVLP paint spray guns, with a maximum surface coating capacity of 5.75 gallons of coating per unit and 0.0625 units per hour. Emission unit Up Draft utilizes dry filters for emissions control and exhausts indoors. Emission unit Up Draft was constructed in 1988.
- (d) Two (2) cold cleaning degreasing units with a combined consumption of less than one hundred forty five (145) gallons of solvent per twelve (12) consecutive month period. Each cold cleaning unit utilizes Safety Kleen 105 Solvent. One (1) cold cleaning unit is located in the body shop and one (1) cold cleaning unit is located in the mechanical shop. Each cold cleaning unit was installed in 2007.
- (e) Six (6) Metal Inert Gas (MIG) (carbon steel) welding stations with a maximum capacity of 1.33 pounds of welding consumables and five (5) torch cutting stations. Welding and torch cutting operations commenced after 1997.



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
indy.gov/dpw

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 (sixty (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.
3. Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from Blast Room # 1 shall not exceed 2.18 pounds per hour when operating at a process weight rate of 0.39 tons per hour. The pound per hour limitation was calculated with the following equation:

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) Wheelabrator pulse jet baghouse shall be in operation at all times Blast Room # 1 is in operation in order to comply with this limit.
4. Pursuant to 326 IAC 6-3-2(d)(Particulate Emission Limitations for Manufacturing Processes), emission unit Down Draft and emission unit Up Draft are each subject to the following:
 - (a) Particulate from the surface coating process shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
 - (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.
5. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coatings delivered to the applicator at emission unit Down Draft

and emission unit Up Draft shall be limited to 3.5 pounds of VOC per gallon of coating less water, for air dried or forced warm air dried coatings.

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

6. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator 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; and
 - (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.

7. Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, existing as of July 1, 1990, 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:
 - (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.
 - (1) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (2) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (3) 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.
- (c) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee 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.

This registration is the first approval issued to this source. The source may operate according to 326 IAC 2-5.1.

An authorized individual shall provide an annual notice to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis, Office of Environmental Services (OES) that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Ave.
Indianapolis, IN 46221

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) and OES 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 Mark Caraher, at (317) 327-2272 or mcaraher@indygov.org.

Sincerely,

ORIGINAL SIGNED BY

Timothy J. Method
Environmental Coordinator

mbc

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

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3).

Company Name:	Dickinson Fleet Services, LLC
Address:	4709 West 96th Street, Indianapolis, Indiana 46268
City:	Indianapolis
Phone #:	(317) 339-2906
Registration #:	R097-25171-00624

Certification by the Authorized Individual	
I hereby certify that Dickinson Fleet Services, LLC is :	<input type="checkbox"/> still in operation. <input type="checkbox"/> no longer in operation.
I hereby certify that Dickinson Fleet Services, LLC is :	<input type="checkbox"/> in compliance with the requirements of Registration R097-25171-00624. <input type="checkbox"/> not in compliance with the requirements of Registration R097-25171-00624.
YEAR: _____	
Name (typed):	
Title:	
Signature:	
Phone Number:	
Date:	

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

Technical Support Document (TSD) for a Registration

Source Description and Location
--

Source Name:	Dickinson Fleet Services, LLC
Source Location:	4709 West 96th Street, Indianapolis, Indiana 46268
County:	Marion
SIC Code:	7538
Registration No.:	R097-25171-00624
Permit Reviewer:	M. Caraher

On August 20, 2007, the Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) received an application from Dickinson Fleet Services related to the construction and operation of a new truck repair facility.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective October 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.	

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary

emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.

- (3) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM2.5**
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 a surrogate for PM2.5 emissions pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.
- (c) **Other Criteria Pollutants**
Marion County has been classified as attainment or unclassifiable in Indiana for PM10, SO₂, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission unit(s):

- (a) One (1) blasting room, identified as emission unit Blast Room # 1, utilizing JetMag as the blasting media and consisting of one 7/16 inch blasting nozzle operating at one hundred twenty five (125) pounds per square inch pressure. The maximum hourly blasting media process rate is 0.39 tons per hour. Blast Room # 1 utilizes one (1) Wheelabrator pulse jet baghouse and two (2) dry filter cartridges for emissions control exhausting indoors. The one (1) Wheelabrator baghouse recirculates the JetMag blast media and is an integral part of Blast Room # 1 operations. Blast Room # 1 was constructed in 1999.
- (b) One (1) down draft paint spray booth, identified as emission unit Down Draft, utilizing HVLP paint spray guns, with a maximum surface coating capacity of 5.75 gallons of coating per unit and 0.0625 units per hour. Emission unit Down Draft utilizes dry filters for emissions control and exhausts indoors. Emission unit Down Draft was constructed in 1979.
- (c) One (1) up draft paint spray booth, identified as emission unit Up Draft, utilizing HVLP paint spray guns, with a maximum surface coating capacity of 5.75 gallons of coating per unit and 0.0625 units per hour. Emission unit Up Draft utilizes dry filters for emissions control and exhausts indoors. Emission unit Up Draft was constructed in 1988.
- (d) Two (2) cold cleaning degreasing units with a combined consumption of less than one hundred forty five (145) gallons of solvent per twelve (12) consecutive month period. Each cold cleaning unit utilizes Safety Kleen 105 Solvent. One (1) cold cleaning unit is located in the body shop and one (1) cold cleaning unit is located in the mechanical shop. Each cold cleaning unit was installed

in 2007.

- (e) Six (6) Metal Inert Gas (MIG) (carbon steel) welding stations with a maximum capacity of 1.33 pounds of welding consumables and five (5) torch cutting stations. Welding and torch cutting operations commenced after 1997.

“Integral Part of the Process” Determination (if applicable)

Dickinson Fleet Services, LLC has submitted the following information to justify why the one (1) Wheelabrator pulse jet baghouse should be considered an integral part of Blast Room # 1 operations:

- (a) Blast Room # 1 was designed by the manufacturer of the blast room to recycle and reuse blast media until it becomes a powder. The Wheelabrator pulse jet baghouse is incorporated in the manufacturer's design of Blast Room # 1 to perform the recycling function. The baghouse filters any blast media that does not break down into a powder. After filtration of the blast media by the Wheelabrator pulse jet baghouse, two (2) dry filter cartridges serve to control any powdered blast media exhausting indoors. The bulk of the blast media utilized in Blast Room # 1 is reused up to seven (7) times. Because of the current design of the equipment and its ability to recycle and reuse blast media, operation of the Wheelabrator pulse jet baghouse should be considered an integral part of Blast Room # 1 operations.
- (b) Operation of the Wheelabrator pulse jet baghouse in Blast Room # 1 provides an overwhelming positive net economic benefit versus not operating control equipment. Installation of Blast Room # 1 in 1999, including the Wheelabrator pulse jet baghouse, cost \$238,376. Dickinson Fleet Services, LLC made four (4) purchases of JetMag blast media through the first ten months of 2007 for a total purchase of 3136 bags. Each bag of JetMag blast media weighs 55 pounds and costs \$8.25 per bag for a total expenditure of \$25,468. If the blast media was not recycled and reused, but purchased seven fold that amount, the ten month expenditure would have been \$181,104 (7 x 3136 bags x \$8.25 = \$181,104). Operating costs of all control equipment in Blast Room # 1 and depreciation of Blast Room # 1 equipment is estimated at \$1,986 for the first ten months of 2007. Therefore, the net savings by recycling and reusing blast media through the first ten (10) months of 2007 was \$153,246 (\$181,104 - \$25,468 - \$1,986 = \$153,246). Therefore, operation of the Wheelabrator pulse jet baghouse in Blast Room # 1 provides an overwhelming positive net economic benefit versus not operating control equipment.

IDEM, OAQ and OES have evaluated the information submitted and agree that the one (1) Wheelabrator pulse jet baghouse should be considered an integral part of Blast Room # 1 operations. This determination is based on the fact that Blast Room # 1 was designed to recycle blast media and the recycling of the blast media by the Wheelabrator pulse jet baghouse in Blast Room # 1 provides an overwhelming positive net economic benefit versus not operating control equipment. Therefore, the permitting level will be determined using the potential to emit after the Wheelabrator pulse jet baghouse in Blast Room # 1. Operating conditions in the proposed permit will specify that the Wheelabrator pulse jet baghouse shall operate at all times Blast Room # 1 is in operation.

Enforcement Issues

IDEM, OAQ and OES are aware that equipment has been constructed and operated prior to receipt of the proper permit. IDEM, OAQ and OES are reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Registration

The following table reflects the unlimited potential to emit (PTE) of the entire source after integral controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process or Emission Unit/Year of Construction	Potential To Emit of the Entire Source (tons/year)							
	PM	PM10*	SO ₂	NO _x	VOC	CO	Total HAPs	Highest Single HAP
Blast Room # 1 (1999)	0.35	0.35	negl.	negl.	negl.	negl.	negl.	negl.
Down Draft (1979)	3.73	3.73	negl.	negl.	4.26	negl.	1.83E-03	1.83E-03
Up Draft (1988)	3.73	3.73	negl.	negl.	4.26	negl.	1.83E-03	1.83E-03
Degreasing (2007)	negl.	negl.	negl.	negl.	0.49	negl.	negl.	negl.
Welding / Torch Cutting (1997)	0.35	0.35	negl.	negl.	negl.	negl.	1.75E-02	3.99E-03
Fugitive Emissions	negl.	negl.	negl.	negl.	negl.	negl.	negl.	negl.
Total PTE of Entire Source	8.16	8.16	negl.	negl.	9.01	negl.	2.12E-02	1.83E-03
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.								

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of PM and PM10 are within the ranges listed in 326 IAC 2-5.1-2(a)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.1-2(a)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registrations). A Registration will be issued.
- (b) The potential to emit (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, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

- (a) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included in the Registration.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the Registration.
- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the Registration, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-1.1-5 (Non-attainment New Source Review)
Marion County has been designated as nonattainment for PM_{2.5}. According to an EPA guidance memo dated April 5, 2005, PM₁₀ is to be utilized as a surrogate for PM_{2.5} until the EPA can promulgate the PM_{2.5} implementation rule. PM₁₀ emissions, and therefore PM_{2.5} emissions, from this source are less than one hundred (100) tons per twelve consecutive month period. There have been no modifications to this source such that it is a major source of PM₁₀ emissions. Therefore, this source is not subject to nonattainment new source review requirements for PM_{2.5} emissions.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements)
This source is not a major stationary source because no attainment regulated pollutant emissions are equal to or greater than two hundred fifty (250) tons per year, this source is not one of the 28 listed source categories under 326 IAC 2-2 and no nonattainment regulated pollutant emissions are equal to or greater than one hundred (100) tons per year. There have been no modifications or revisions to this source that were major modifications pursuant to 326 IAC 2-2. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) is not applicable to the source.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
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. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (d) 326 IAC 2-5.1-2 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70 Permit Program), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 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:
 - (1) 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.
 - (2) 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.

- (g) 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.
- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because this source is not a source of fugitive particulate matter emissions. Therefore, 326 IAC 6-5 does not apply.
- (i) 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County) and 326 IAC 6.5-6 (Marion County)
This source has the potential to emit particulate of less than one hundred (100) tons per year and has actual emissions less than ten (10) tons per year (see Appendix A page 6). Dickinson Fleet Services, LLC is not specifically identified in 326 IAC 6.5-6 (Marion County). Therefore, 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County) and 326 IAC 6.5-6 (Marion County) do not apply to this source.
- (j) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited potential to emit of VOC from each emission unit is less than twenty-five (25) tons per year (see Appendix A page 6).
- (k) 326 IAC 11 (Emission Limitations for Specific Types of Operations)
This truck repair operation does not perform any specific type of operation identified in 326 IAC 11 (Emission Limitations for Specific Types of Operations). Therefore, this source is not subject to 326 IAC 11.
- (l) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (m) 326 IAC 14 (Emission Standards for Hazardous Air Pollutants)
There are no provisions under 326 IAC 14 (Emission Standards for Hazardous Air Pollutants) and 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants) applicable to any specific emission unit or operation at this source. Therefore, this source is not subject to the provisions of 326 IAC 14 (Emission Standards for Hazardous Air Pollutants) and 40 CFR Part 61 (National Emission Standards for Hazardous Air Pollutants).
- (n) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Blast Room # 1

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2, particulate matter (PM) emissions from Blast Room # 1 shall not exceed 2.18 pounds per hour when operating at a process weight rate of 0.39 tons per hour. The pound per hour limitation was calculated with the following equation:

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) Wheelabrator pulse jet baghouse shall be in operation at all times Blast Room # 1 is

in operation in order to comply with this limit (see Appendix A page 1).

Down Draft and Up Draft paint spray booths

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Emission unit Down Draft and emission unit Up Draft each uses greater than five (5) gallons of coating(s) per day (see Appendix A page 2). Therefore, pursuant to 326 IAC 6-3-2(d)(Particulate Emission Limitations for Manufacturing Processes), emission unit Down Draft and emission unit Up Draft are each subject to the following:
- (a) Particulate from the surface coating process shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
 - (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.
- (b) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations),
Emission unit Down Draft and emission unit Up Draft each have actual VOC emissions greater than fifteen (15) pounds per day (see Appendix A page 2) from surface coating miscellaneous metal parts. Therefore, pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coatings delivered to the applicator at emission unit Down Draft and emission unit Up Draft shall be limited to 3.5 pounds of VOC per gallon of coating less water, for air dried or forced warm air dried coatings.

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

Based on the MSDS' submitted by the source and the calculations made (see Appendix A page 1), emission unit Down Draft and emission unit Up Draft are each in compliance with this requirement.

Degreasing

- (a) 326 IAC 8-3-2 (Cold Cleaner Operations)
Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator 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; and
 - (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.
- (b) 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control)
Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, existing as of July 1, 1990, 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:
 - (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.
 - (1) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (2) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (3) 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 of carbon adsorption. Such systems shall be submitted to the U.S.

EPA as a SIP revision.

- (c) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee 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.

Welding and Torch Cutting

- (a) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Each welding equipment station and cutting torch station has potential particulate emissions less than 0.551 pounds per hour (see Appendix A page 5). In addition, welding operations using less than 625 pounds of rod or wire consumed per day (see Appendix A page 5) are specifically exempt from the requirements of 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes). Therefore, 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) does not apply to welding and cutting torch operations.

Conclusion and Recommendation

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 August 20, 2007 and additional information was received on November 26, 2007. An OES plant tour was conducted on September 4, 2007.

The construction and operation of this source shall be subject to the conditions of the attached Registration No. R097-25171-00624. The staff recommends to the Administrator that this Registration be approved.

City of Indianapolis OES Contact

- (a) Questions regarding this registration can be directed to Mr. Mark Caraher with The City of Indianapolis Office of Environmental Services, 2700 South Belmont Avenue, Indianapolis, Indiana 46221.
- (b) A copy of the findings is available on the Internet at: www.in.gov/idem/permits/air/pending.html.
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem/permits/guide/.

Appendix A: Emission Calculations
 Abrasive Blasting
 Company Name: Dickinson Fleet Service
 Address City IN Zip: 4709 West 96th Street, Indianapolis, IN 46268
 Permit Number: R097-25171-00624
 Pit ID: 097-00624
 Reviewer: M. Caraher
 Date: February 11, 2008

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)
Al oxides	160
Sand	99
Steel	487
JetMag	80

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	125
1/8	28	35	42	49	55	63	70	77	84
3/16	65	80	94	107	122	135	149	165	181
1/4	109	138	168	195	221	255	280	309	338
5/16	205	247	292	354	377	420	462	507	552
3/8	285	355	417	477	540	600	657	720	783
7/16	385	472	560	645	755	820	905	940	975
1/2	503	615	725	835	945	1050	1160	1265	1370
5/8	820	990	1170	1336	1510	1680	1850	2030	2210
3/4	1140	1420	1670	1915	2160	2400	2630	2880	3130
1	2030	2460	2900	3340	3780	4200	4640	5060	5480

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

975
80
99
0.4375
0.4375

Flow Rate (FR) (lb/hr) = 787.879 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM / lb abrasive) From Table 1 =
 FR = Flow Rate (lb/hr) =
 w = fraction of time of wet blasting =
 N = number of nozzles =

0.010
787.879
0
1

Uncontrolled Emissions =	7.88 lb/hr
	34.51 ton/yr

Emissions after Integral Baghouse =	0.08 lb/hr
	0.35 ton/yr

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, 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)
 Emissions after Integral Baghouse = PTE x (1-control efficiency)
 Estimated baghouse control efficiency = 99%

**Appendix A: Emissions Calculations
VOC and Particulate**

Surface Coating Operations - Potential emissions from each Paint Spray Booth

Company Name: Dickinson Fleet Service
Address City IN Zip: 4709 West 96th Street, Indianapolis, IN 46268
Permit Number: R097-25171-00624
Pit ID: 097-00624
Reviewer: M. Caraher
Date: February 11, 2008

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 Emissions per Paint Booth				lb VOC/gal solids	Transfer Efficiency
											Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)		
E2W017 White Sealer *	15.50	12.00%	0.0%	12.0%	0.0%	88.00%	2.00	0.0625	1.86	1.86	0.23	5.58	1.02	1.87	2.11	75%
GH1091 Hardener *	8.92	25.00%	0.0%	25.0%	0.0%	75.00%	0.75	0.0625	2.23	2.23	0.10	2.51	0.46	0.34	2.97	75%
GT1047 Paint (Violet) *	8.62	39.33%	0.0%	39.3%	0.0%	60.67%	3.00	0.0625	3.39	3.39	0.64	15.26	2.78	1.07	5.59	75%
GT1002 Paint (Clear) **	9.31	20.30%	5.7%	14.6%	6.4%	79.70%	3.00	0.0625	1.45	1.36	0.26	6.12	1.12	1.52	1.71	75%
State Potential Emissions											0.97	23.34	4.26		5.59	
METHODOLOGY														3.73		

* = worst case VOC emitting coating
** = worst case PM emitting paint coating

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 hrs/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
Transfer efficiency for airless spray guns on flat surfaces from Air Pollution Engineering Manual (AWMA) 1992.

worst case VOC & PM emitting coating used above
Paint 1 truck (unit) every 16 hours. Therefore, 8760 hrs/16 hours per truck = 547.5 trucks painted/year/booth.
Use 5.75 gallons paint per truck (unit). Therefore, 5.75 gal/truck x 1 truck/16 hours x 8760 hours/yr = 3,148 gal/yr or 0.3594 gallons per hour.
0.3594 gallons/hour / 5.75 gallons/unit = 0.0625 units per hour/booth.

Paint overspray (Particulate Potential) PM10 emissions = PM emissions.

Appendix A: Emission Calculations

HAP Emission Calculations

Surface Coating Operations - Potential emissions from each Paint Spray Booth

Company Name: Dickinson Fleet Service
Address City IN Zip: 4709 West 96th Street, Indianapolis, IN 46268
Permit Number: R097-25171-00624
Plt ID: 097-00624
Permit Reviewer: M. Caraher
Date: February 11, 2008

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Hexamethylene Diisocyanate	Hexamethylene Diisocyanate Emissions (tons/year)	Combined HAP Emissions (ton/yr)
E2W817 White Sealer *	15.5	2.00	0.0625	0.00%	0.00	0.00
GH1091 Hardener *	8.92	0.75	0.0625	0.10%	1.83E-03	1.83E-03
GT1047 Paint (Violet) *	8.62	3.00	0.0625	0.00%	0.00	0.00
GT1002 Paint (Clear)	9.31	3.00	0.0625	0.00%	0.00	0.00

Total State Potential to Emit, worst case coating =*

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs
HAPS weight % from MSDS in application

**Appendix A: Emission Calculations
Degreasing**

Page 4 of 6 TSD App A

Company Name: Dickinson Fleet Service
Address City IN Zip: 4709 West 96th Street, Indianapolis, IN 46268
Permit Number: R097-25171-00624
Plt ID: 097-00624
Reviewer: M. Caraher
Date: February 11, 2008

Degreasing operations that do not exceed 145 gallons consumed (spent) per 12 month period

Degreasing solvent density = pounds per gallon

Potential to emit = tons per year

METHODOLOGY

VOC emission rate (tons/yr) = (Density (lb/gal) * 145 (gal/yr)) / 1 ton/2000 lbs
Solvent Density based on application, MSDS for Safety Kleen 105 Solvent

Appendix A: Emission Calculations

Plant Wide Emissions Summary

Company Name: Dickinson Fleet Service
Address City IN Zip: 4709 West 96th Street, Indianapolis, IN 46268
Permit Number: R097-25171-00624
Plt ID: 097-00624
Reviewer: M. Caraher
Date: February 11, 2008

Plant Wide Emissions Summary (tons per year)							Highest Single HAP	Combination HAP
	PM	PM10	NO_x	SO₂	VOC	CO		
Abrasive Blasting	0.35	0.35	0.00	0.00	0.00	0.00	0.00E+00	0.00E+00
Surface Coating (Down Draft Booth)	3.73	3.73	0.00	0.00	4.26	0.00	1.83E-03	1.83E-03
Surface Coating (Up Draft Booth)	3.73	3.73	0.00	0.00	4.26	0.00	1.83E-03	1.83E-03
Degreasing	0.00	0.00	0.00	0.00	0.49	0.00	0.00E+00	0.00E+00
Welding	0.35	0.35	0.00	0.00	0.00	0.00	3.99E-03	1.75E-02
Potential to Emit	8.16	8.16	0.00	0.00	9.01	0.00	1.83E-03	2.12E-02