

DATE: April 28, 2008

TO: Interested Parties / Applicant

RE: AAR Aircraft Services, Indianapolis / SPM097-25436-00559

FROM: Timothy J. Method  
Environmental Coordinator



## 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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 501, Indianapolis, IN 46204, **within fifteen (15) days of the receipt 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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



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)



April 28, 2008

Mr. Stan Mayer  
Vice President of Operations  
AAR Aircraft Services, Indianapolis  
2825 West Perimeter Road, Suite 101  
Indianapolis, Indiana 46241

CERTIFIED MAIL 7007 0710 0005 3965 7470

Re: First Significant Permit Modification (SPM)  
SPM097-25436-00559 to Part 70 Operating  
Permit T097-9602-00156

Dear Mr. Mayer:

The Indianapolis Airport Authority (IAA) was issued Part 70 Operating Permit No. T097-9602-00156 on June 26, 2003 for an aerospace vehicle maintenance center. AAR Aircraft Services, Indianapolis (AAR) was issued an Administrative Amendment 097-22389-00559 on December 29, 2005 to transfer operational control of aerospace manufacturing and rework facilities from IAA to AAR.

A Significant Permit Modification application was received from AAR on October 16, 2007 requesting to construct and operate a new paint booth, identified as emission unit P-2, for surface coating the exterior of aerospace vehicles in hangar 5 located at 2825 West Perimeter Road, Indianapolis, Indiana 46241. The application is assigned the tracking number SPM097-25436-00559.

Pursuant to the provisions of 326 IAC 2-7-12(d), the Part 70 Operating Permit is hereby modified as described in the attached Technical Support Document for a Significant Permit Modification to a Part 70 Operating Permit.

The page numbering in the Table of Contents has been updated to reflect the effect of the Modification on the renumbering of pages. All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. 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



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

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TDD 327-5186  
[indygov.org/dpw](http://indygov.org/dpw)

Enclosure: Revised Permit  
Technical Support Document  
Notice of Decision

mbc

cc: Files  
Permits – Mark Caraher  
Compliance - Matt Mosier  
U.S. EPA, Region V  
Mindy Hahn, IDEM OAQ  
Marion County Health Department



**PART 70 OPERATING PERMIT**  
**INDIANA DEPARTMENT OF ENVIRONMENTAL**  
**MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**and**  
**CITY OF INDIANAPOLIS**  
**OFFICE OF ENVIRONMENTAL SERVICES**

**AAR Aircraft Services, Indianapolis**  
**2825 West Perimeter Road,**  
**2745 South Hoffman Road, Suite 504, and**  
**2500 South High School Road**  
**Indianapolis, Indiana 46241**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17 and the Code of Indianapolis and Marion County, Chapter 511.

Operation Permit No.: T097-9602-00156	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality  John Chavez Administrator, OES	Issuance Date: June 26, 2003  Expiration Date: June 25, 2008
First Part 70 Administrative Amendment No.: 097-21245-00559, issued October 14, 2005. Second Part 70 Administrative Amendment No.: 097-22389-00559, issued December 29, 2005.	
First Significant Permit Modification No.: 097-25436-00559      Conditions Affected: Entire permit	
Issued by:  ORIGINAL SIGNED BY  Timothy J. Method Environmental Coordinator	Issuance Date: April 28, 2008  Expiration Date: June 25, 2008



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

**Department of Public Works**  
**Office of Environmental Services**

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**Stratospheric Ozone Protection**

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and City of Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 and A.3 through A.5 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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This source consists of an airfield, a stationary aerospace vehicle maintenance center which performs various maintenance tasks on aircraft and a central energy plant.

Source Address: 2825 West Perimeter Road, Indianapolis, Indiana 46241,  
2745 South Hoffman Road, Suite 504, Indianapolis,  
Indiana 46241, and  
2500 South High School Road, Indianapolis, Indiana  
46241

Mailing Address: 2825 West Perimeter Road, Suite 101, Indianapolis,  
Indiana 46241

General Source Phone Number: (317) 227- 5066

SIC Code: 4581

County Location: Marion

Source Location Status: Nonattainment for PM2.5  
Attainment for all other criteria pollutants.

Source Status: Part 70 Permit Program  
Minor Source, Section 112 of the Clean Air Act  
and Nonattainment New Source Review  
Major Source under PSD Rules  
Nested Source with fossil fuel fired boilers (or  
combinations thereof) totalling more than two  
hundred fifty million (250,000,000) British thermal  
units per hour heat input, as 1 of 28 Source  
Categories

### A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

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This airfield, aerospace vehicle maintenance center and central energy plant source consists of four (4) plants:

- (a) Plant 1, Indianapolis Airport Authority (097-21243-00156), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241 and 2500 South High School Road (and various collocated addresses), Indianapolis, Indiana 46241;
- (b) Plant 2, BHMM Energy Services, LLC - IMC Central Energy Plant (097-00586), is located at 2745 South Hoffman Road, Indianapolis, Indiana 46241;
- (c) Plant 3, AAR Aircraft Services, Indianapolis (097-21245-00559), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241; and
- (d) Plant 4, Indianapolis Diversified Machining, Inc. (097-21325-00560), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241.

IDEM, OAQ and OES have determined that since the four (4) plants are located on contiguous or adjacent properties and are under common control of the same entity, the Indianapolis Airport Authority, they will be considered one (1) source, effective from the date of issuance of this Part

70 Operating Permit Amendment. These four (4) plants are considered one source because BHMM Energy Services, LLC - IMC Central Energy Plant is dedicated to the aerospace vehicle maintenance center and AAR Aircraft Services, Indianapolis will occupy the majority of the aircraft hangars at the maintenance center. Indianapolis Diversified Machining, Inc. receives from AAR Aircraft Services, Indianapolis more than fifty percent (50%) of its work flow and supplies these goods and services back to AAR Aircraft Services, Indianapolis. Therefore, the term "source" in the Part 70 documents refers to the Indianapolis Airport Authority, BHMM Energy Services, LLC - IMC Central Energy Plant, AAR Aircraft Services, Indianapolis and Indianapolis Diversified Machining, Inc. as one source.

Separate Part 70 permits will be issued to Indianapolis Airport Authority with Permit No.: 097-21243-00156, BHMM Energy Services, LLC - IMC Central Energy Plant with Permit No.: 097-25234-00586, AAR Aircraft Services, Indianapolis with Permit No.: 097-25436-00559 and Indianapolis Diversified Machining, Inc. with Permit No.: 097-21325-00560 solely for administrative purposes.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

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

- (a) Five (5) service hangars with activities relating to the coating of aircraft parts identified as emissions unit EU-013, service hangars 1, 2, 3, 5 and 6 are used for routine and nonroutine maintenance, with paint booths using high volume, low pressure (HVLV) spray application systems. The table below summarizes the startup dates for each hangar:

Hangar	Date Operation Began
Hangar 1	March 27, 1994
Hangar 2	December 13, 1994
Hangar 3	February 15, 1995
Hangar 5	September 1, 1995
Hangar 6	December 13, 1996

- (b) One (1) paint booth, identified as emission unit P-2, for surface coating the exterior of aerospace vehicles. Emission unit P-2 is located in Hangar 5 and has a maximum surface coating capacity of 58.0 gallons of coating per unit and 0.0041 units per hour. Emission unit P-2 utilizes high volume, low pressure (HVLV) spray application systems and is equipped with dry filters for particulate overspray control. Emission unit P-2 includes the use of surface coating stripper solvents for depainting operations that do not contain HAP with maximum usage of stripper solvents of 110.0 gallons per unit and 0.0041 units per hour. Emission unit P-2 exhausts at thirty two (32) roof vents identified as Stack/Vent P-2-1 through Stack Vent P-2-32. The surface coating of the exterior of aerospace vehicles also includes natural gas fired make-up air heating units with a combined maximum heat input rate of 36.0 million Btu per hour identified as emission unit B-1. Emission unit P-2 and Emission unit B-1 are each approved to construct in 2008.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) The following degreasing operations that do not individually exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3].
- (1) Ten (10) parts cleaners located in Hangars 1, 2, 3, 5 or 6.
- (b) The following grinding and machining operations located in Hangar 1, 2, 3, 5 or 6 and controlled with fabric filters, scrubbers, mist collectors, wet collectors, electrostatic

precipitators, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations with uncontrolled potential to emit of less than five (5) pounds of PM-10 per hour and less than twenty five (25) pounds of PM-10 per day. [326 IAC 6-3]

- (1) Seven (7) Grit Blast Cabinets.
- (c) The following activities or categories not previously identified which have potential emissions less than significance thresholds listed under 326 IAC 2-7-1(21): [326 IAC 6-3]
  - (1) The following emission units located in Hangar 1, 2, 3, 5 or 6 with potential VOC emissions less than 3 pounds per hour, potential PM emissions less than 5 pounds per hour and potential HAP emissions less than 1 ton per year:
    - (A) Downdraft Benches
    - (B) ECB Booth
    - (C) Fugitives (Cleaning)
    - (D) Sanding Benches
    - (E) Touchup Booths
  - (d) Cleaners and solvents characterized as having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F) or having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months. Cleaning operations include hand wiping and spray gun cleaning. These activities are located in Hangar 1, 2, 3, 5 and 6 and in emission unit P-2. Potential VOC emissions are less than 3 pounds per hour and potential HAP emissions are less than 1 ton per year. [40 CFR 63, Subpart GG][326 IAC 20]

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B

## GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

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This permit, T097-9602-00156 (as amended in Part 70 Operating Permit Administrative Amendment No. T097-22389-00559, issued on December 29, 2005), is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

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- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) The Indianapolis Air Pollution Control Board (IAPCB) has adopted by reference state rules listed in Attachment A of this permit. The version adopted by reference includes all amendments, additions and repeals filed with the Secretary of State through August 10, 1997 and published in the Indiana Register on September 1, 1997, unless otherwise indicated in the adoption by reference or in Appendix A. For the purposes of this permit, all state rules adopted by reference by the IAPCB are enforceable by OES using local enforcement procedures. Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.5 Severability [326 IAC 2-7-5(5)]

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

### B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)][326 IAC 2-7-5(6)(E)][326 IAC 2-7-6(6)]

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- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

And

Office of Environmental Services

Air Quality Management Section, Permits  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and OES copies of records required to be kept by this permit.
- (c) For information furnished by the Permittee to IDEM, OAQ, or OES the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for:
  - (1) Enforcement action:
  - (2) Permit termination, revocation, reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

**B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source’s compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall

cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

and

Indianapolis OES  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221-2009

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, and OES may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) If required by specific conditions in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

and

Indianapolis OES  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221-2009

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the IDEM Commissioner or OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Administrator within a reasonable time.

#### B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and OES within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for IDEM, OAQ, Compliance Section),  
or:

Telephone Number: 317-233-0178 (ask for IDEM, OAQ, Compliance  
Section)  
Facsimile Number: 317-233-6865;

and

Telephone Number: 317-327-2234 (ask for OES, Air Compliance)  
Facsimile Number: 317-327-2274.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

and

Indianapolis OES  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221-2009

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, and OES may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, and OES by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determination regarding this source:
  - (1) All references to Boiler 1 as being a 10.24 MMBtu/hr boiler were revised to refer to this emission unit as a 12.6 MMBtu/hr boiler. All emission calculations will reflect this revised capacity.
  - (2) All references to Boiler 2 as being a 20.49 MMBtu/hr boiler were revised to refer to this emission unit as a 25.2 MMBtu/hr boiler. All emission calculations will reflect this revised capacity.
  - (3) All references to boilers 3 and 4 (Emission Units 3 and 4) as being a 106 MMBtu/hr boilers were revised to refer to these emission unit as a 122 MMBtu/hr boilers. All emission calculations will reflect this revised capacity.
  - (4) Condition 15f of 096-00156-01 was amended to specify that small aerosol spray paint cans are not included.
  - (5) All references to 326 IAC 2-1 from previous construction permits were amended to refer to 326 IAC 2-1.1

- (6) The requirement from condition 9 of 096-00156-01, issued November 25, 1996, listing requirements pursuant to 326 IAC 6-1-2(b)(4) and pursuant to 326 IAC 6-1-2(b)(5) are not applicable since the actual PM emissions do not exceed 10 tons per year and potential PM emissions do not exceed 100 tons per year. IDEM, OAQ and OES have determined that there was an error in rule applicability in the previous construction permit.
- (7) The requirement from condition 13 of 096-00156-01, issued November 25, 1996, listing requirements to estimate the Jet A fuel equivalence in cubic feet of natural gas in order to stay below SO<sub>2</sub> emission limitations, and to keep records of this usage is not necessary because equivalent natural gas usage greatly exceeds source wide potential natural gas usage.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, and OES shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, or OES has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, or OES has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported 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 OES  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221-2009

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, or OES determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ, or OES to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, or OES at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or OES may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and OES and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

and

Indianapolis OES  
Air Permits  
2700 South Belmont Avenue  
Indianapolis, IN 46221-2009

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.
  - (2) If IDEM, OAQ and OES, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, and OES, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by

the deadline specified in writing by IDEM, OAQ, and OES, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ and OES fails to act in a timely way on a Part 70 permit renewal, the U.S.EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

and

Indianapolis OES  
Air Permits  
2700 South Belmont Avenue  
Indianapolis, IN 46221-2009

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

Indianapolis OES  
Air Permits  
2700 South Belmont Avenue  
Indianapolis, IN 46221-2009

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, and OES in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the

applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, and OES U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

and

Indianapolis OES  
Air Permits  
2700 South Belmont Avenue  
Indianapolis, IN 46221-2009

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and OES within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, or OES, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licencing, and Training Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

#### C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

#### C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

#### C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment are in operation.

#### C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(e)&(f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-52 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

Indianapolis OES  
Asbestos Section  
2700 South Belmont Avenue  
Indianapolis, IN 46221-2009

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

### Testing Requirements [326 IAC 2-7-6(1)]

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

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

and

Indianapolis OES  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221-2009

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ, and OES of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and OES if the Permittee submits to IDEM, OAQ, and OES a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### Compliance Requirements [326 IAC 2-1.1-11]

#### C.10 Compliance Requirements [326 IAC 2-1.1-11]

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

### Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

#### C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If

required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

and

Indianapolis OES  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221-2009

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.
- (b) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (c) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 40 CFR 60, Subpart Db.

C.13 Maintenance of Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment.
- (b) In the event that a breakdown of a continuous opacity monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (c) Whenever a continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup COM shall be brought on line within four (4) hours of shutdown of the primary COM, if possible. If this is not possible, visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of one (1) hour beginning four (4) hours after the start of the malfunction or down time.
  - (1) If the reading period begins less than one hour before sunset, readings shall be

performed until sunset. If the first required reading period would occur between sunset and sunrise, the first reading shall be performed as soon as there is sufficient daylight.

- (2) Method 9 opacity readings shall be repeated for a minimum of one (1) hour at least once every four (4) hours during daylight operations, until such time that the continuous opacity monitor is back in operation. observations within four hours of the second abnormal notation.
- (3) All of the opacity readings during this period shall be reported in the Quarterly Deviation and Compliance Monitoring Reports.
- (d) Nothing in this condition or in Section D of the permit, shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5, and 40 CFR 63, Subpart D.

**C.14 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

**C.15 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( 2%) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( 2%) of full scale reading.
- (c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.
- (d) The Permittee may request the IDEM, OAQ, and OES to approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on November 27, 1996.
- (b) If the ERP is disapproved by IDEM, OAQ, and OES, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) Upon direct notification by IDEM, OAQ, and OES, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.

[326 IAC 1-5-3]

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A Risk Management Plan was prepared as required by 40 CFR 68 and submitted to IDEM, OAQ and OES.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, and OES within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ, and OES that retesting in one-hundred twenty (120) days is not practicable, IDEM, OAQ, and OES may extend the retesting deadline.
- (c) IDEM, OAQ, and OES reserve the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in

326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32)) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

Indianapolis OES  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221-2009

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and OES on or before the date it is due.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or the OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or the OES Administrator within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility (as defined in 40 CFR 51.165 (a)(6)(vi)(A), 40 CFR 51.165 (a)(6)(vi)(B), 40 CFR 51.166 (r)(6)(vi)(a), and/or 40 CFR 51.166 (r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
  - (1) Before beginning actual construction of the "project" (as defined in

326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II) at an existing emissions unit, document and maintain the following records:

- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
  - (i) Baseline actual emissions;
  - (ii) Projected actual emissions;
  - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
  - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165 (a)(6)(vi)(A) and/or 40 CFR 51.166 (r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
  - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
  - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

And

Indianapolis OES  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221-2009

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in an applicable rule.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ and OES.
  - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
  - (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
  - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

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

and

Indianapolis OES  
Air Compliance  
2700 South Belmont Ave.  
Indianapolis, IN 46221

- (h) The report for a project at an existing emissions unit other than Electric Utility Steam Generating Unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C - General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
  - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

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

and

Indianapolis OES  
Air Compliance  
2700 South Belmont Ave.  
Indianapolis, IN 46221

- (i) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C - General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ and OES. The general public may request this information from the IDEM, OAQ and OES under 326 IAC 17.1.

### **Stratospheric Ozone Protection**

#### **C.23 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]:**

- (a) Five (5) service hangars with activities relating to the coating of aircraft parts identified as missions unit EU-013, service hangars 1, 2, 3, 5 and 6 are used for routine and non routine maintenance, with paint booths using high volume, low pressure (HVLP) spray application systems. The table below summarizes the startup dates for each hangar:

Hangar	Date Operation Began
Hangar 1	March 27, 1994
Hangar 2	December 13, 1994
Hangar 3	February 15, 1995
Hangar 5	September 1, 1995
Hangar 6	December 13, 1996

- (b) One (1) paint booth, identified as emission unit P-2, for surface coating the exterior of aerospace vehicles. Emission unit P-2 is located in Hangar 5 and has a maximum surface coating capacity of 58.0 gallons of coating per unit and 0.0041 units per hour. Emission unit P-2 utilizes high volume, low pressure (HVLP) spray application systems and is equipped with dry filters for particulate overspray control. Emission unit P-2 includes the use of surface coating stripper solvents for depainting operations that do not contain HAP with maximum usage of stripper solvents of 110.0 gallons per unit and 0.0041 units per hour. Emission unit P-2 exhausts at thirty two (32) roof vents identified as Stack/Vent P-2-1 through Stack Vent P-2-32. The surface coating of the exterior of aerospace vehicles also includes natural gas fired make-up air heating units with a combined maximum heat input rate of 36.0 million Btu per hour identified as emission unit B-1. Emission unit P-2 and Emission unit B-1 are each approved to construct in 2008.

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

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-1-6] [CP096-00156-01 Condition 15]**

Pursuant to CP096-00156-01 Condition 15, issued November 25, 1996, and to operating procedures outlined in the top down BACT analysis in accordance with 326 IAC 8-1-6, the Permittee shall achieve Best Available Control Technology for coatings used in the Service Hangars and Indirect Support Shops as specified below:

- (a) The Permittee shall not apply to aerospace components any coating in the following categories with a VOC content in excess of the following limits (except as noted in condition b), expressed as grams of VOC per liter (lbs/gal) of coating as applied, excluding water:

Coating Category	VOC Content	
	g/liter	lbs/gal
Primer – coatings applied directly to the aerospace component for the purpose of corrosion prevention, protection from the environment, functional fluid resistance and adhesion of subsequent coatings.	350	2.9
Adhesive bonding primer – coatings applied in a very thin film to aerospace metal for the primary purpose of providing a primer for a subsequent coating of structural adhesive.	850	7.1
Interior Topcoat – coating used in interior habitable spaces of aircraft.	340	2.8
Electric or Radiation Effect Coating – Electrical conductive or insulative coatings	800	6.7

Coating Category	VOC Content	
	g/liter	lbs/gal
and coatings used on radar and antennae enclosures.		
Extreme Performance and Interior Topcoat – A topcoat used in interior spaces of the aircraft areas requiring fluid, stain or nicotine barrier.	420	3.5
Fire Insulation Coating – Coatings used to provide a layer of insulation in the event of an aircraft or engine fire.	600	5.0
Fuel Tank Coating – Coatings applied to the interior of a fuel tank or fuel wetted area of the aircraft to protect it from corrosion.	720	6.0
High Temperature Coating – A coating that during its normal use must withstand temperatures in excess of 350 degrees Fahrenheit.	720	6.0
Sealant – A coating applied for the purpose of filling voids and providing a barrier against penetration of water, fuel or other fluids or vapors.	600	5.0
Self-priming Topcoat – A coating applied directly to the aerospace component that is not subsequently over coated.	420	3.5
Topcoat – Coatings applied over a primer or intermediate coating for the purposes such as appearance, identification or protection.	420	3.5
Pretreatment Wash Primer – A coating which contains a minimum of 0.5% acid by weight for surface etching and is applied directly to a bare metal surface to provide corrosion resistance and adhesion.	420	3.5
Sealant Bonding Primer – A coating applied in a very thin film to an aerospace component for the purposes of providing a primer for subsequent coat of a silicon sealant.	720	6.0
Temporary Protection Coating – A coating applied to an aerospace component to protect it from any mechanical or environmental damage during manufacturing.	250	2.1

- (b) The aforementioned coating requirements shall not apply to:
- (1) Application of coating to assembled printed circuit boards
  - (2) Coating of paper, fabrics and films
  - (3) Applications of adhesives
  - (4) Use of Adhesive bonding primers that have a cure temperature in excess of 325F
  - (5) Use of hand held non refillable aerosol cans
  - (6) Application of coatings by template or hand in order to add designs, letters and/or numbers to the products
  - (7) Application of a solid film lubricant (anti chafe coating)
  - (8) Coating of test panels used to evaluate coating performance
  - (9) Use of low usage coating which are coating with separate formulations that are used in volumes of less than 20 gallons per calendar year, provided that the requirements of D.5.1(c) are met and no more than 200 gallons of low usage coatings may be classified as exempt per year.
- (c) Annually the Permittee shall provide a list in writing to OES of coatings to be covered under the low usage exemptions D.1.1(b)(9) for the following calendar year, the expected volume to be used and the maximum VOC content. The Permittee shall notify OES in writing of any additional coatings added to this list during the calendar year.
- (d) The Permittee shall maintain a document containing a list of all coatings with coating limitations which may be used during the following year, the coating category, the VOC

limit for the coating category, the mix ratio (if applicable), and VOC content of the coating as applied expressed as pounds per gallon of coating less water. This document will be updated periodically and in the interim, memos containing the required information will be issued as needed for new coatings or reformulations of existing coatings.

- (e) Compliance with the coating limitations shall be based on methods specified in 326 IAC 8-1-4(a).
- (f) The Permittee shall utilize High Volume, Low Pressure (HVLP) and/or touch up guns transfer technology when applying coatings by spray. HVLP shall mean coating equipment which is used to apply coatings by means of a gun that operates between 0.1 and 10 psig air atomizing spray. Touch up guns shall mean small air spray equipment, including air brushes, that operate at no greater than 5 cfm air flow and no greater than 50 psig air pressure. These requirements do not apply to aerosol spray paint cans or the following:
  - (1) The application of coatings to surface areas with limited access due to visual impairment which requires a 360 degree spray gun extension.
  - (2) The application of waterborne extreme performance interior topcoat coating.
  - (3) The application of adhesive bonding primers and pretreatment was primers.
  - (4) The application of a textured finish coat. A textured finish coat shall be considered any coating used to produce a non smooth, patterned surface that is intentionally produced and applied as a final coat by spraying drops of coating over a previously applied base coat.

#### D.1.2 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to emission unit EU-013 and emission unit P-2 as described in this section except when otherwise specified in 40 CFR Part 63, Subpart GG, Table 1.

#### D.1.3 Aerospace NESHAP [40 CFR 63 Subpart GG] [326 IAC 20]

This source is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63.741, Subpart GG), even though HAP emissions are less than the major source thresholds, because the potential to emit HAPs at the time of rule promulgation was assumed to be greater than the major source thresholds (based on EPA determination). Emission unit EU-013 and emission unit P-2 are subject to the following requirements:

- (a) Except for coating and coating operations listed in 40 CFR 63.742 or those coatings or coating operations listed in 40 CFR 63.741(f), the following conditions apply to uncontrolled primer coating operations. Organic HAP and VOC content limits: 350 grams/liter (2.9 lb/gal less water for HAP and less water and exempt solvents for VOC) as applied. Compliance shall be achieved through:
  - (1) using coatings below content limits, or
  - (2) using monthly volume weighted averaging (primers only) to meet content limits. [40 CFR 63.745(e)]
- (b) Except for the use of specialty coatings as defined in 40 CFR 63.742 or those coatings or coating operations listed in 40 CFR 63.741(f), the following conditions apply to uncontrolled topcoat coating operations. Organic HAP and VOC content limit: 420 g/l (3.5 lb/gal less water for HAP, and less water and exempt solvents for VOC) as applied. [40 CFR 63.745(c)(3),(4)] Compliance shall be achieved through:

- (1) using coatings below content limits, or
  - (2) Using monthly volume weighted averaging (topcoats) to meet content limits. [40 CFR 63.745(e)]
- (c) With respect to all coating applications operations, the following conditions apply:
- (1) Pursuant to 40 CFR 63.745(b), minimize spills during handling and transfer of all materials. Pursuant to 40 CFR 63.748 minimize spills during handling and transfer of waste materials which contain HAPs.
  - (2) Pursuant to 40 CFR 63.745(f)(1), specific application techniques must be used.
  - (3) Pursuant to 40 CFR 63.745(f)(2), all application equipment must be operated according to manufacturer's specifications, company procedures, or operating procedures (whichever is more stringent).
  - (4) Pursuant to 40 CFR 63.745(g)(2), operating requirements must be followed for the application of primers or topcoats that contain inorganic HAP, including control with particulate filters (see Tables 1 through 4 of 40 CFR 63.745). Painting operation(s) must be shutdown if operated outside manufacturer's specified limits.
- (d) Pursuant to 40 CFR 63.746, the following conditions apply to the depainting of the outer surface areas of completed aerospace vehicles:
- (1) Except as provided by Condition D.1.3(d)(2) and D.1.3(d)(3), the depainting operation in emission unit P-2 shall emit no organic HAP from chemical stripping formulations and agents or chemical paint softeners.
  - (2) Where non-chemical based equipment is used to comply with Condition D.1.3(d)(1), either in total or in part, the permittee shall operate and maintain the equipment according to the manufacturer's specifications or locally prepared operating procedures. During periods of malfunctions of such equipment, the permittee may use substitute materials during the repair period provided the substitute materials used are those available that minimize organic HAP emissions. In no event shall substitute materials be used for more than 15 days annually, unless such materials are organic HAP-free.
  - (3) The permittee shall not, on an annual average basis, use more than 26 gallons of organic HAP-containing chemical strippers or alternatively 190 pounds of organic HAP per commercial aircraft depainted; or more than 50 gallons of organic HAP-containing chemical strippers or alternatively 365 pounds of organic HAP per military aircraft depainted for spot stripping and decal removal.
  - (4) Depainting operations in emission unit P-2 must comply with the inorganic HAP requirements specified in 40 CFR 63.746(b)(4).
  - (5) Pursuant to 40 CFR 63.746, the following activities are exempt from depainting requirements:
    - (A) Depainting of radomes.
    - (B) Depainting of parts, subassemblies, and assemblies normally removed from the primary aircraft structure before depainting.
    - (C) Depainting of parts or units normally removed from the aerospace vehicle for depainting. However, depainting of wings and stabilizers is always subject to the requirements of 40 CFR 63.746 regardless of whether

their removal is considered by the Permittee to be normal practice for depainting.

**D.1.4 Particulate [326 IAC 6-3-2(d)]**

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Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes in emission unit EU-013 shall be controlled by a dry particulate filter control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B.12 - Preventive Maintenance Plan, of this permit, is required for surface coating processes in emission unit EU-013 and emission unit P-2 and any control devices.

**Compliance Determination Requirements**

**D.1.6 Volatile Organic Compounds [40 CFR 63, Subpart GG][326 IAC 20]**

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Compliance with the VOC content and usage limitations contained in Condition D.1.1 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAQ, and OES reserve the right to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.1.7 VOC Emissions [40 CFR 63, Subpart GG][326 IAC 20]**

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Pursuant to 40 CFR 63.749(d)(1), for uncontrolled coatings that are not averaged, each 24 hour period is considered a performance test; for uncontrolled coatings which are averaged, each 30 day period is considered a performance test. An organic HAP content level determination is made pursuant to 40 CFR 63.750(c) and (d), and a VOC content level determination is made pursuant to 40 CFR 63.750(e) and (f). An initial performance test is required for all control devices used to control VOC and organic HAPs to demonstrate compliance with overall control efficiency requirements, pursuant to 40 CFR 63.749(d)(2).

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.8 Dry Particulate Filters [40 CFR 63, Subpart GG][326 IAC 20]**

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Pursuant to 40 CFR 63.751(c)(1) and 40 CFR 63.751(d), the Permittee shall, while the primer, topcoat application operations and depainting operations are occurring, continuously monitor the pressure drop across the system, and read and record pressure drop once per shift.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.9 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1 and 326 IAC 8-1-6, the Permittee shall maintain documentation for all coatings containing the name of the coating, VOC content as received and applied, the mix ratio (if applicable), and the VOC content of the coating as applied expressed as pounds per gallon of coating less water. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents. The documentation will be updated periodically and in the interim, memos containing the required information will be issued as needed for new coatings or reformulations of existing coatings.
- (b) Pursuant to 40 CFR 63.752(c)(2), for uncontrolled primer and topcoat applications that meet organic HAP and VOC content limits without averaging, the Permittee shall maintain documentation containing organic HAP and VOC contents as applied, data/calculations and test results used to determine HAP/VOC content as ( $H_i$  and  $G_i$ ) and monthly usage.
- (c) Pursuant to Conditions D.1.1, D.1.3 and 40 CFR 63.752(c)(3), for "Low HAP content"

primer and topcoat applications (as described in 40 CFR 63.752(c)(3)), the Permittee shall maintain documents containing annual purchase records, and data/calculations and test results used to determine  $H_i$  or HAP/VOC content as applied.

- (d) Pursuant to Conditions D.1.1, D.1.3 and 40 CFR 63.752(c)(4), for uncontrolled primer and topcoat applications complying with HAP or VOC content limits by averaging, the Permittee shall maintain documents containing: monthly volume weighted average values of HAP/VOC content ( $H_a$  and  $G_a$ ), and data/calculations and test results used to calculate  $H_a$  and  $G_a$ .
- (e) Pursuant to Conditions D.1.4, D.1.8, 40 CFR 63.751(c)(1) and 40 CFR 63.752(d)(1) the Permittee shall maintain a record of the pressure drop readings taken once per shift while the primer or topcoat applications are occurring.
- (f) Pursuant to 40 CFR 63.752(e), the Permittee shall record the information specified in (1) through (5) for depainting operations:
  - (1) For all chemical strippers used in the depainting operation:
    - (A) The name of each chemical stripper; and
    - (B) Monthly volumes of each organic HAP containing chemical stripper used or monthly weight of organic HAP-material used for spot stripping and decal removal.
  - (2) For HAP-containing chemical strippers that are controlled by a dry particulate filter:
    - (A) The overall control efficiency of the control system (as determined using the procedures specified in §63.750(h)) and all test results, data, and calculations used in determining the overall control efficiency;
  - (3) For each type of aircraft depainted at the facility, a listing of the parts, subassemblies, and assemblies normally removed from the aircraft before depainting. Prototype, test model or aircraft that exist in low numbers (i.e., less than 25 aircraft of any one type) are exempt from this requirement.
  - (4) If dry media blasting equipment is used to comply with the organic HAP emission limit specified in 40 CFR 63.746(b)(1):
    - (A) The names and types of non-chemical based equipment; and
    - (B) For periods of malfunction,
      - (i) The non-chemical method or technique that malfunctioned;
      - (ii) The date that the malfunction occurred;
      - (iii) A description of the malfunction;
      - (iv) The methods used to depaint aerospace vehicles during the malfunction period;
      - (v) The dates that these methods were begun and discontinued; and
      - (vi) The date that the malfunction was corrected.
  - (5) For spot stripping and decal removal, the volume of organic HAP-containing chemical stripper or weight of organic HAP used, the annual average volume of

organic HAP-containing chemical stripper or weight of organic HAP used per aircraft, the annual number of aircraft stripped, and all data and calculations used.

- (g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.10 Reporting Requirements

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- (a) A semi-annual summary of the information to document compliance with Condition D.1.1 and D.1.3 of this permit shall be submitted to the addresses listed in Section C - General Reporting Requirements within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). This summary shall include information that identify:
- (1) For uncontrolled primer and topcoat applications that meet organic HAP and VOC content limits without averaging, each value of HAP/VOC content as ( $H_i$  and  $G_i$ ) that exceeds the applicable HAP or VOC content limit specified in 40 CFR 63.745(c).
  - (2) for uncontrolled primer and topcoat applications complying with HAP or VOC content limits by averaging, each value of  $H_a$  and  $G_a$  that exceeds the applicable HAP or VOC content limit specified in 40 CFR 63.745(c).
  - (3) a statement certifying compliance with all requirements of 40 CFR 63, Subpart GG.
- (b) An annual written report to document compliance with Conditions D.1.1(c) shall be submitted to OES including:
- (1) coatings to be covered under the low usage exemptions D.1.1(b)(9) for the following calendar year,
  - (2) the expected volume to be used and the maximum VOC content.
  - (3) The Permittee shall notify OES in writing of any additional coatings added to this list during the calendar year.
- (c) An annual report listing the number of times that the pressure drop for each dry filter system was outside the limits specified by the filter or booth manufacturer. [40 CFR 63.753(c)(2)]
- (d) Pursuant to 40 CFR 63.753(d), the permittee shall submit the following information for the depainting operation in emission unit P-2:
- (1) Semiannual reports occurring every 6 months from the date of the notification of compliance status that identify:
    - (A) Any 24-hour period where organic HAP were emitted from the depainting of aerospace vehicles, other than from the exempt operations listed in 40 CFR 63.746 (a), (b)(3), and (b)(5).
    - (B) Any new chemical strippers used at the facility during the reporting period;
    - (C) The organic HAP content of these new chemical strippers;

- (D) For each chemical stripper that undergoes reformulation, its organic HAP content;
  - (E) Any new non-chemical depainting technique in use at the facility since the notification of compliance status or any subsequent semiannual report was filed;
  - (F) For periods of malfunctions:
    - (i) The non-chemical method or technique that malfunctioned;
    - (ii) The date that the malfunction occurred;
    - (iii) A description of the malfunction;
    - (iv) The methods used to depaint aerospace vehicles during the malfunction period;
    - (v) The dates that these methods were begun and discontinued; and
    - (vi) The date that the malfunction was corrected;
  - (G) All periods where a nonchemical depainting operation subject to 40 CFR 63.746(b)(2) and (b)(4) for the control of inorganic HAP emissions was not immediately shut down when the pressure drop, water flow rate, or recommended booth parameter(s) was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operational procedures;
  - (H) A list of new and discontinued aircraft models depainted at the facility over the last 6 months and a list of the parts normally removed for depainting for each new aircraft model being depainted; and
  - (I) If the depainting operation has been in compliance for the semiannual period, a statement signed by a responsible company official that the operation was in compliance with the applicable standards.
- (2) Annual reports occurring every 12 months from the date of the notification of compliance status that identify:
- (A) The average volume per aircraft of organic HAP-containing chemical strippers or weight of organic HAP used for spot stripping and decal removal operations if it exceeds the limits specified in §63.746(b)(3); and
  - (B) The number of times the pressure drop limit(s) for each filter system or the number of times the water flow rate limit(s) for each waterwash system were outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

Specifically regulated insignificant activity:

- (a) The following degreasing operations that do not individually exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3].
  - (1) Ten (10) parts cleaners located in Hangar 1, 2, 3, 5 or 6.

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

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

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

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

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

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility, construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38<sup>o</sup>C) (one hundred degrees Fahrenheit (100<sup>o</sup>F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9<sup>o</sup>C) (one hundred twenty degrees Fahrenheit (120<sup>o</sup>F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the 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.

### SECTION D.3

### FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-7-5(15)]

Specifically regulated insignificant activity:

- (b) The following grinding and machining operations located in Hangar 1, 2, 3, 5 or 6 and controlled with fabric filters, scrubbers, mist collectors, wet collectors, electrostatic precipitators, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations with uncontrolled potential to emit of less than five (5) pounds of PM-10 per hour and less than twenty five (25) pounds of PM-10 per day. [326 IAC 6-3]
  - (1) Seven (7) Grit Blast Cabinets.
- (c) The following activities or categories not previously identified which have potential emissions less than significance thresholds listed under 326 IAC 2-7-1(21): [326 IAC 6-3]
  - (1) The following emission units located in Hangar 1, 2, 3, 5 or 6 with potential VOC emissions less than 3 pounds per hour, potential PM emissions less than 5 pounds per hour and potential HAP emissions less than 1 ton per year:
    - (A) Downdraft Benches
    - (B) ECB Booth
    - (C) Fugitives (Cleaning)
    - (D) Sanding Benches
    - (E) Touchup Booths

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

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

##### D.3.1 Particulate [326 IAC 6-3-2]

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Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions rate from any process not already regulated by 326 IAC 6.5-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. Those processes are listed above.

#### Compliance Determination Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

##### D.3.2 Particulate Matter (PM)

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In order to comply with D.3.1, the dry filter systems for PM control shall be in operation and control emissions at all times that deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking are in operation.

**SECTION D.4 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]**

Specifically regulated insignificant activity:

- (d) Cleaners and solvents characterized as having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F) or having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months. Cleaning operations include hand wiping and spray gun cleaning. These activities are located in Hangar 1, 2, 3, 5 and 6 and in emission unit P-2. Potential VOC emissions are less than 3 pounds per hour and potential HAP emissions are less than 1 ton per year. [40 CFR 63, Subpart GG][326 IAC 20]

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

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**D.4.1 General Provisions Relating to HAPS [326 IAC 20-1][40 CFR Part 63, Subpart A]**

The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart GG, Table 1.

**D.4.2 Aerospace NESHAP [40 CFR 63 Subpart GG][326 IAC 20]**

This facility is subject to the National Emission Standards for Hazardous Air Pollutants for Aerospace Manufacturing and Rework Facilities, 326 IAC 20-15 (40 CFR 63.741, Subpart GG).

Cleaning Solvent Type	Composition Requirements
Aqueous	Cleaning solvents in which water is the primary ingredient ( > 80 percent of cleaning solvent solution as applied must be water). Detergents surfactants, and bioenzyme mixtures and nutrients may be combined along with a variety of additives, such as organic solvents (e.g. high boiling point alcohols, builders, saponifiers, inhibitors, emulsifiers, pH buffers, and antifoaming agents). Aqueous solutions must have a flash point greater than 93 C (200F) (as reported by the manufacturer), and the solution must be miscible with water.
Hydrocarbon Based	Cleaners that are composed of photochemically reactive hydrocarbons and/or oxygenated hydrocarbons and have a maximum vapor pressure of 7 mm Hg at 20C (3.75 in H2O and 68F). Those cleaners also contain no HAP.

- (a) The following housekeeping requirements apply pursuant to 40 CFR 63.744(a) unless the cleaning solvent used is identified in Table 1 of 40 CFR 63.744 (shown above), or contains HAP and VOC below the deminimus levels specified in 40 CFR 63.741(f).
  - (1) Pursuant to 40 CFR 63.744(a)(1), the Permittee shall place cleaning solvent laden cloth, paper or other absorbent applicators in bags or other closed containers upon completing their used.
  - (2) Pursuant to 40 CFR 63.744(a)(2), the Permittee shall store fresh and spent cleaning solvents (except semi-aqueous) in closed containers.
  - (3) Pursuant to 40 CFR 63.744(a)(3), the Permittee shall conduct the handling and transfer of cleaning solvents to or from enclosed systems, vats, waste containers, and other cleaning operation equipment that hold or store fresh or spent cleaning

solvents in a way which minimizes spills.

- (b) Except for the cleaning of spray gun equipment performed in accordance with 40 CFR 63.744(c)(3), all hand wipe cleaning solvents must meet the composition requirements identified in Table 1 of 40 CFR 63.744 (above) or have a composite vapor pressure at or below 45 mm Hg at 20C.
- (c) For spray gun cleaning operations, the Permittee shall use one of the four specified techniques or their equivalent, pursuant to 40 CFR 63.744(c).
- (d) For enclosed spray gun cleaners, if leaks are found during the monthly inspection, source should repair as soon as practicable, but within 15 days, pursuant to 40 CFR 63.744(c)(1)(ii).
- (e) If cleaning solvent solutions that contain HAP and VOC below the de minimis levels are used, those cleaning operations using such solutions are exempt from the requirements of 40 CFR 63.744(c)
- (f) For flush cleaning operations source must empty used cleaning solvent into enclosed container, collection system, or system with equivalent emission control pursuant to 40 CFR 63.744(d).

#### **Compliance Determination Requirements**

##### D.4.3 Hand Wipe Cleaning [40 CFR 63.749(c)(1)]

An affected hand wipe cleaning operation shall be considered in compliance when all hand wipe cleaning solvents, excluding those used for hand wipe cleaning of spray gun equipment under 40 CFR 63.744(c), meet either the composition requirements specified in 40 CFR 63.744(b)(1) or the vapor pressure requirement specified in 40 CFR 63.744(b)(2).

##### D.4.4 Spray Gun Cleaning [40 CFR 63.749(c)(2)]

An affected spray gun cleaning operation shall be considered in compliance when each of the following conditions is met:

- (a) One of four techniques specified in 40 CFR 63.744(c)(1) through (c)(4) is used:
- (b) The technique selected is operated according to the procedures specified in 40 CFR 63.744(c)(1) through (c)(4) as appropriate; and
- (c) If an enclosed system is used, monthly visual inspections are conducted and any leak detected is repaired within 15 days after detection. If the leak is not repaired by the 15th day after detection, the solvent shall be removed and the enclosed cleaner shall be shutdown until the cleaner is repaired or its use is permanently discontinued.

##### D.4.5 Flush Cleaning [40 CFR 63.749(c)(3)]

An affected flush cleaning operation shall be considered in compliance if the operating requirements specified in 40 CFR 63.744(d) are implemented and carried out.

##### D.4.6 Compliance Test Methods for Cleaning Operations [40 CFR 63.750(a) and (b)]

Permittee shall make composition determinations using manufacturing data [40 CFR 63.750(a)] or a vapor Pressure determination using readily available sources such as MSDS if single component; composite vapor pressure determined by manufacturer's supplied data or ASTM E 260-91 and by equation provided for multiple component solvents. [40 CFR 63.750(b)]

## **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

### **D.4.7 Monitoring Requirements for Cleaning Operations [40 CFR 63.751(a)]**

Permittee shall conduct monthly visual leak inspection for enclosed spray gun cleaners in accordance with the requirements of 40 CFR 63.751(a).

## **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.4.8 Record Keeping Requirements for Cleaning Operations [40 CFR 63.752(b)]**

- (a) Pursuant to 40 CFR 63.752(b)(2), each cleaning solvent used in hand wipe cleaning operations that complies with the composition requirements specified in 40 CFR 63.744(b)(1) or for semi aqueous cleaning solvents used for flush cleaning operations:
- (1) The name of each cleaning solvent used;
  - (2) all data and calculations that demonstrate that the cleaning solvent complies with one of the composition requirements; and
  - (3) annual records of the volume of each solvent used, as determined from facility purchase records or usage records.
- (b) For each cleaning solvent used in hand wipe cleaning operations that does not comply with the composition requirements in 40 CFR 63.744(b)(1), but does comply with the vapor pressure requirements in 40 CFR 63.744(b)(2):
- (1) The name of each cleaning solvent used;
  - (2) the composite vapor pressure of each cleaning solvent used;
  - (3) all vapor pressure test results, if appropriate data and calculations used to determine the composite vapor pressure of each cleaning solvent; and
  - (4) the amount (in gallons) of each cleaning solvent used each month at each operation.
- (c) For each cleaning solvent used for the exempt hand wipe cleaning operations specified in 40 CFR 63.744(e) that does not conform to the vapor pressure or composition requirements of 40 CFR 63.744(b):
- (1) The identity and amount (in gallons) of each cleaning solvent used each month at each operation; and
  - (2) a list of processes set forth in 40 CFR 63.744(e) to which the cleaning operation applies.
- (d) A record of all leaks from enclosed spray gun cleaners identified pursuant to 40 CFR 63.751(a) that includes, for each leak found:
- (1) Source identification;
  - (2) Date leak was discovered; and
  - (3) Date leak was repaired.

### **D.4.9 Reporting Requirements for Cleaning Operations [40 CFR 63.753(b)]**

A semi-annual summary of the information to document compliance with Condition D.4.2 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit

within thirty (30) days after the end of the six (6) month period being reported. The report submitted by the Permittee requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). The summary shall include:

- (a) Statement certifying compliance. [40 CFR 63.753(b)(1)(v)]
- (b) Semiannual report for hand wiping operations' noncompliant cleaning solvent used. [40 CFR 63.753(b)(1)(i)]
- (c) Semiannual report of all new cleaning solvents and their composite vapor pressure or notifications of compliance with composition requirements. [40 CFR 753(b)(1)(ii)]
- (d) Semiannual report of noncompliant spray gun cleaning method used. [40 CFR 63.753(b)(1)(iii)]
- (e) Leaks from enclosed spray gun cleaners not repaired within 15 days. [40 CFR 63.753(b)(1)(iv)]

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

**COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**and  
Indianapolis Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221-2009**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: AAR Aircraft Services, Indianapolis  
Source Address: 2825 West Perimeter Road, Indianapolis, Indiana 46241,  
2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241, and  
2500 South High School Road, Indianapolis, Indiana 46241  
Mailing Address: 2825 West Perimeter Road, Suite 101, Indianapolis, Indiana 46241  
Part 70 Permit No.: T097-9602-00156

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

Annual Compliance Certification Letter

Test Result (specify)

Report (specify)

Notification (specify)

Affidavit (specify)

Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
*and*  
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES  
AIR COMPLIANCE**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: AAR Aircraft Services, Indianapolis  
Source Address: 2825 West Perimeter Road, Indianapolis, Indiana 46241,  
2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241, and  
2500 South High School Road, Indianapolis, Indiana 46241  
Mailing Address: 2825 West Perimeter Road, Suite 101, Indianapolis, Indiana 46241  
Part 70 Permit No.: T097-9602-00156

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)  |
| <input checked="" type="checkbox"/> The Permittee must notify the Office of Air Quality (OAQ), and OES within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and            |
| <input checked="" type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. |

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
and  
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES  
AIR COMPLIANCE  
PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: AAR Aircraft Services, Indianapolis  
Source Address: 2825 West Perimeter Road, Indianapolis, Indiana 46241,  
2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241, and  
2500 South High School Road, Indianapolis, Indiana 46241  
Mailing Address: 2825 West Perimeter Road, Suite 101, Indianapolis, Indiana 46241  
Part 70 Permit No.: T097-9602-00156

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement (specify permit condition #)</b>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement (specify permit condition #)</b>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement (specify permit condition #)</b>	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By:

Title/Position:

Date:

Phone:

Attach a signed certification to complete this report.

## Attachment A

The following State rules have been adopted by reference by the Indianapolis Air Pollution Control Board and are enforceable by Indianapolis Office of Environmental Services (OES) using local enforcement procedures.

- (1) 326 IAC 1-1-1 through 1-1-3 and 1-1-5;
- (2) 326 IAC 1-2-1 through 1-2-91 (In addition, the IAPCB has adopted several local definitions);
- (3) 326 IAC 1-3-1 through 1-3-4;
- (4) 326 IAC 1-4-1 (The IAPCB added to the adoption by reference a citation to 61 FR 58482 (November 15, 1996));
- (5) 326 IAC 1-5-1 through 1-5-5;
- (6) 326 IAC 1-6-1 through 1-6-6;
- (7) 326 IAC 1-7-1 through 1-7-5;
- (8) 326 IAC 2-3-1 through 326 IAC 2-3-5;
- (9) 326 IAC 2-4-1 through 326 IAC 2-4-6;
- (10) 326 IAC 2-6-1 through 326 IAC 2-6-4;
- (11) 326 IAC 2-7-1 through 2-7-18; 2-7-20 through 2-7-25;
- (12) 326 IAC 2-8-1 through 2-8-15, 2-8-17;
- (13) 326 IAC 2-9-1 through 2-9-14;
- (14) 326 IAC 2-10-1 through 2-10-5 (The IAPCB adoption adds the language "state or local" immediately after the word "federal" in 326 IAC 2-10-1);
- (15) 326 IAC 2-11-1, 2-11-3 and 2-11-4 (The IAPCB adoption adds the language "state or local" immediately after the word "federal" in 326 IAC 2-11-1);
- (16) 326 IAC 3-1.1-1 through 3-1.1-5;
- (17) 326 IAC 3-2.1 through 3-2.1-5;
- (18) 326 IAC 3-3-1 through 3-3-5;
- (19) 326 IAC 4-2-1 through 4-2-2;
- (20) 326 IAC 5-1-1(a), (b) and (c)(5), 5-1-2(1), (2)(A), (2)(c)(4), 5-1-3 through 5-1-5, 5-1-7;
- (21) 326 IAC 7-1.1-1 and 7-1.1-2;
- (22) 326 IAC 7-2-1;
- (23) 326 IAC 7-3-1 and 7-3-2
- (24) 326 IAC 7-4-2(28) through (31) (Instead of adopting by reference 7-4-2(1) through (27), the IAPCB regulation substitutes the same requirements listed in a format in which the companies are alphabetized and emission points known to no longer exist have been deleted);
- (25) 326 IAC 8-1-0.5 except (b), 8-1-1 through 8-1-2, 8-1-3 except c), (g) and (i), 8-1-5 through 8-1-12;
- (26) 326 IAC 8-2-1 through 8-2-12 (The IAPCB adoption by reference of 8-2-5 adds additional language specific to Zimmer Paper Products, Incorporated as subpart c);
- (27) 326 IAC 8-3-1 through 8-3-7;
- (28) 326 IAC 8-4-1 through 8-4-5, 8-4-6(a)(6), (a)(8) and (a)(14) and 8-4-6(b)(1), (b)(3) and 8-4-6 c) (In place of 8-4-6(b)(2), which was not adopted, the IAPCB adopted language requiring a pressure relief valve set to release at no less than four and eight-tenths (4.8) KiloPascals (seven-tenths (0.7) pounds per square inch)), 8-4-7 except (e), 8-4-8 and 8-4-9;
- (29) 326 IAC 8-5-1 through 8-5-4, 8-5-5 except (a)(3) and (d)(3);
- (30) 326 IAC 8-6-1 and 8-6-2;
- (31) 326 IAC 9-1-1 and 9-1-2;
- (32) 326 IAC 11-1-1 through 11-1-2
- (33) 326 IAC 11-2-1 through 11-2-3;
- (34) 326 IAC 11-3-1 through 11-3-6;
- (35) 326 IAC 14-1-1 through 14-1-4;
- (36) 326 IAC 14-2-1 except 40 CFR 61.145;
- (37) 326 IAC 14-3-1;
- (38) 326 IAC 14-4-1;
- (39) 326 IAC 14-5-1;
- (40) 326 IAC 14-6-1;
- (41) 326 IAC 14-7-1;
- (42) 326 IAC 14-8-1 through 14-8-5;
- (43) 326 IAC 15-1-1, 15-1-2(a)(1), (a)(2) and (a)(8), 15-1-3 and 15-1-4;
- (44) 326 IAC 20-1-1 through 20-1-4 (In 20-1-3(b)(2) the adoption states that "permitting authority" means the commissioner of IDEM or the administrator of OES, whichever is applicable);
- (45) 326 IAC 20-2-1;
- (46) 326 IAC 20-3-1;
- (47) 326 IAC 20-4-1;
- (48) 326 IAC 20-5-1;

- (49) 326 IAC 20-6-1;
- (50) 326 IAC 20-7-1;
- (51) 326 IAC 20-8-1;
- (52) 326 IAC 20-9-1;
- (53) 326 IAC 20-14-1;
- (54) 326 IAC 20-15-1;
- (55) 326 IAC 20-16-1;
- (56) 326 IAC 20-17-1;
- (57) 326 IAC 20-18-1;
- (58) 326 IAC 20-19-1;
- (59) 326 IAC 20-20-1;
- (60) 326 IAC 20-21-1;
- (61) 326 IAC 21-1-1 (The adoption state that "or the administrator of OES" is added in (b));
- (62) 326 IAC 22-1-1 (The adoption state that "or the administrator of OES" is added in (b));

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

Technical Support Document (TSD) for a Minor Source Modification and a  
Significant Permit Modification to a Part 70 Operating Permit

<b>Source Description and Location</b>	
--	--

<b>Source Name:</b>	<b>AAR Aircraft Services, Indianapolis</b>
<b>Source Location:</b>	<b>2825 West Perimeter Road, Indianapolis, Indiana 46241, 2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241 and 2500 South High School Road, Indianapolis, Indiana 46241</b>
<b>County:</b>	<b>Marion</b>
<b>SIC Code:</b>	<b>3721</b>
<b>Operation Permit No.:</b>	<b>T097-9602-00156</b>
<b>Operation Permit Issuance Date:</b>	<b>June 26, 2003</b>
<b>Collocated Source Administrative Amendment Issuance Date (see Source Definition section):</b>	<b>October 14, 2005</b>
<b>Minor Source Modification No.:</b>	<b>MSM097-25415-00559</b>
<b>Significant Permit Modification No.:</b>	<b>SPM097-25436-00559</b>
<b>Permit Reviewer:</b>	<b>M. Caraher</b>

<b>Source Definition</b>
--------------------------

This airfield, aerospace vehicle maintenance center and central energy plant source consists of four (4) plants:

- (a) Plant 1, Indianapolis Airport Authority (T097-00156), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241 and 2500 South High School Road (and various collocated addresses), Indianapolis, Indiana 46241;
- (b) Plant 2, BHMM Energy Services, LLC - IMC Central Energy Plant (T097-00586), is located at 2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241;
- (c) Plant 3, AAR Aircraft Services, Indianapolis (T097-00559), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241; and
- (d) Plant 4, Indianapolis Diversified Machining, Inc. (T097-00560), is located at 2825 West Perimeter Road, Suite 106, Indianapolis, Indiana 46241.

IDEM, OAQ and OES have determined that since the four (4) plants are located on contiguous or adjacent properties and are under common control of the same entity, the Indianapolis Airport Authority (IAA), they will be considered one (1) source, effective from the date of issuance of Part 70 Operating Permit Administrative Amendment No. T097-22919-00586 issued on November 30, 2006.

These four (4) plants are considered one source because the aerospace vehicle maintenance center and the airfield are under the common control of IAA. IAA leases most of the aerospace vehicle maintenance center and the existing permitted equipment to AAR Aircraft Services, Indianapolis (AAR) and Indianapolis Diversified Machining, Inc. (IDM). AAR occupies the majority of the aircraft hangars at the aerospace vehicle maintenance center. IDM receives from AAR more than fifty percent (50%) of its work flow and supplies these goods and services back to AAR. IAA will continue to retain Hangar 7 operations and the jet fuel storage tanks. BHMM Energy Services, LLC - IMC Central Energy Plant leases powerhouse operations (Central Energy Plant) at the

aerospace vehicle maintenance center from IAA. The Central Energy Plant is dedicated to the aerospace vehicle maintenance center and the New Indianapolis Airport. IAA does not have the same SIC Code as AAR, IDM or BHMM Energy Services, LLC - IMC Central Energy Plant. However, the Central Energy Plant operations are under the common control of IAA because 100% of the hot water and chill water to be used by the New Indianapolis Airport is contractually supplied by the Central Energy Plant to IAA. The Central Energy Plant is contractually obligated to meet environmental codes, which if not met by the Central Energy Plant, the contract/lease can be terminated by IAA. Therefore, IAA and BHMM Energy Services, LLC - IMC Central Energy Plant are operating as a major source. BHMM Energy Services, LLC - IMC Central Energy Plant is a support facility to AAR and IDM, as it supplies more than 50% of its heating and cooling output to them. As a result, IAA, IMCCEP, AAR and IDM are operating as one major source.

Therefore, the term "source" in the Part 70 documents refers to the Indianapolis Airport Authority, BHMM Energy Services, LLC - IMC Central Energy Plant, AAR Aircraft Services, Indianapolis and Indianapolis Diversified Machining, Inc. as one source.

Separate Part 70 Operating Permits are issued to the Indianapolis Airport Authority with Permit No. T097-9602-00156 (as modified in SPM097-23240-00156), BHMM Energy Services, LLC - IMC Central Energy Plant with Permit No. T097-25234-00586, AAR Aircraft Services, Indianapolis with Permit No. T097-25436-00559, and Indianapolis Diversified Machining, Inc. with Permit No. T097-21325-00560, solely for administrative purposes.

#### Existing Approvals

The source is operating under the following approvals:

- (a) Part 70 Operating Permit, T097-9602-00156, issued on June 26, 2003 to the Indianapolis Airport Authority (IAA).
- (b) First Part 70 Administrative Amendment, 097-21243-00156, issued on October 14, 2005 to the Indianapolis Airport Authority (IAA).
- (c) Part 70 Administrative Amendment, 097-21245-00559, issued on October 14, 2005 to AAR Aircraft Services, Indianapolis (AAR).
- (d) Part 70 Administrative Amendment, 097-21325-00560, issued on October 14, 2005 to Indianapolis Diversified Machining, Inc. (IDM).
- (e) Second Part 70 Administrative Amendment No.: 097-22389-00559, issued December 29, 2005 to AAR Aircraft Services, Indianapolis (AAR).
- (f) Second Part 70 Administrative Amendment, 097-22385-00156, issued on December 29, 2005 to the Indianapolis Airport Authority (IAA).
- (g) Part 70 Administrative Amendment, 097-22919-00586, issued to BHMM Energy Services, LLC (BHMM) on November 30, 2006.
- (h) First Part 70 Significant Permit Modification, 097-23240-00156, issued on August 8, 2007 to the Indianapolis Airport Authority (IAA).

### County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM2.5	nonattainment
PM10	attainment
SO <sub>2</sub>	maintenance attainment
NO <sub>2</sub>	attainment
8-hour Ozone	attainment
CO	attainment
Lead	attainment

Note: On November 8, 2007 the Indiana Air Pollution Control Board finalized a temporary emergency rule to redesignate Marion County as attainment for the 8-hour ozone standard.

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. On November 8, 2007, a temporary emergency rule took effect redesignating Marion County to attainment for the eight-hour ozone standard. The Indiana Air Pollution Control Board has begun the process for a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 should take effect prior to the expiration of the emergency rule. Therefore, VOC emissions and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (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 a surrogate for PM2.5 emissions pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (c) Marion County has been classified as attainment or unclassifiable for PM10, SO<sub>2</sub>, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive emissions  
This existing source consists of an airfield (primary operation) with fossil fuel fired boilers and a collocated aerospace vehicle maintenance center utilizing fossil fuel fired boilers (or combinations thereof) totalling more than two hundred fifty million (250,000,000) British thermal units per hour heat input, which is one of the 28 source categories, as specified in 326 IAC 2-2-1(gg)(1). The primary operation is not in one of the 28 listed source categories under 326 IAC 2-2 and there is no applicable New Source Performance Standard that was in effect on August 7, 1980. However, the entire source, including the aerospace vehicle maintenance center, is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant, NO<sub>x</sub>, is emitted at a rate of two hundred fifty (250) tons per year or more.

The fossil fuel fired boilers located at this source is considered as one of the 28 source categories under 326 IAC 2-2 and is considered "nested" within a non-listed source. The potential to emit NO<sub>x</sub> and CO from the "nested" source is greater than one hundred (100) tons per year (see Enforcement Issues section). Therefore, fugitive emissions are counted toward the determination of PSD applicability from the "nested" source.

**Source Status**

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

<b>Pollutant</b>	<b>PTE of the Entire Source (tons/year)</b>	<b>PTE of Source Wide Nested Fossil Fuel Fired Boilers (tons/year)</b>
PM	less than 250	less than 100
PM10	less than 100	less than 100
PM2.5	less than 100	less than 100
SO <sub>2</sub>	less than 100	less than 100
VOC	greater than 100, less than 250	less than 100
CO	greater than 100, less than 250	greater than 100
NO <sub>x</sub>	greater than 250	greater than 100
Lead	Negligible	Negligible

- (a) This existing source consists of an airfield (primary operation) and a collocated aerospace vehicle maintenance center utilizing fossil fuel fired boilers (or combinations thereof) totalling more than two hundred fifty million (250,000,000) British thermal units per hour heat input, which is one of the 28 source categories, as specified in 326 IAC 2-2-1(gg)(1). Based on PSD guidance for "nesting activities," these operations will be nested for the PSD applicability determination.
- (1) The entire source, including the aerospace vehicle maintenance center, is a major stationary source, under PSD (326 IAC 2-2), because the entire source has the potential to emit NO<sub>x</sub> of two hundred fifty (250) tons per year or more.
- (2) The source wide nested fossil fuel fired boilers is a major stationary source, under PSD (326 IAC 2-2), because the potential to emit NO<sub>x</sub> and CO is one hundred (100) tons per year or more, and it is one of the twenty-eight (28) listed source categories (fossil fuel fired boilers (or combinations thereof) totalling more than two hundred fifty million (250,000,000) British thermal units per hour heat input), as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major stationary source, under Nonattainment New Source Review (326 IAC 2-1.1-5), because PM10 (as a surrogate for PM2.5) is not emitted at a rate of one hundred (100) tons per year or more.
- (c) These emissions are based upon the Part 70 Operating Permit, T097-9602-00156, issued to IAA on June 26, 2003 and on the First Part 70 Significant Permit Modification, 097-23240-00156, issued to IAA on August 8, 2007.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed permit modification, after consideration of all enforceable limits established in the effective permits:

<b>HAPs</b>	<b>Potential To Emit (tons/year)</b>
Highest Single HAP	Less than 10
Total	Less than 25

This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is not a major source under Section 112 of the Clean Air Act (CAA). However, this source is still subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.741, Subpart GG (National Emission

Standards for Aerospace Manufacturing and Rework Facilities), and 326 IAC 20 (Hazardous Air Pollutants), even though HAP emissions are less than the major source thresholds for HAPs, because the potential to emit HAPs at the time of the first significant compliance date for 40 CFR 63.741, Subpart GG was not assumed to be greater than the major source thresholds (based on EPA determination).

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2006 Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM10	1.17
SO <sub>2</sub>	0.11
VOC	0.96
CO	9.50
NO <sub>x</sub>	17.92
HAP	Not reported

### Description of the Proposed Permit Modification

AAR Aircraft Services, Indianapolis (AAR) operates in five of the seven service hangars in the aerospace vehicle maintenance center located at 2825 West Perimeter Road. AAR operates in service hangars 1, 2, 3, 5 and 6 which are used for routine and non-routine aerospace vehicle maintenance including the painting of aerospace vehicle parts in various existing paint booths using high volume, low pressure (HVLP) spray application systems.

This existing source is subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.741, Subpart GG (National Emission Standards for Aerospace Manufacturing and Rework Facilities), and 326 IAC 20 (Hazardous Air Pollutants). Existing painting operations for aerospace vehicle parts in various existing paint booths at AAR are subject to the provisions of 40 CFR 63.741, Subpart GG and 326 IAC 20. In addition, the existing painting operations at AAR are subject to the provisions of 326 IAC 8-1-6, pursuant to CP096-00156-01 Condition 15, issued November 25, 1996, and are subject to Best Available Control Technology for coatings used in the Service Hangars and Indirect Support Shops as stated in the existing Part 70 Permit Condition D.1.1 (Volatile Organic Compound (VOC)).

On October 16, 2007, AAR submitted an application to install a paint booth, and related support equipment, in hangar 5 in order to be able to paint the entire exterior of aerospace vehicles. The new paint booth will be identified as emission unit P-2 and will be subject to the provisions of 40 CFR 63.741, Subpart GG and 326 IAC 20. 326 IAC 8-2-9(b)(2) (Surface Coating Emission Limitations: Miscellaneous Metal Coating Operations) exempts the painting of the exterior of airplanes from any surface coating emission limitations.

The following is a list of the proposed emission units and pollution control devices added to AAR's administrative Part 70 Operating Permit, T097-22389-00559, as revised by this First Part 70 Significant Permit Modification, 097-25436-00559:

One (1) paint booth, identified as emission unit P-2, for surface coating the exterior of aerospace vehicles. Emission unit P-2 is located in Hangar 5 and has a maximum surface coating capacity of 58.0 gallons of coating per unit and 0.0041 units per hour. Emission unit P-2 utilizes high volume, low pressure (HVLP) spray application systems and is equipped with dry filters for particulate overspray control. Emission unit P-2 includes the use of surface coating stripper solvents for depainting operations that do not contain HAP with maximum usage of stripper

solvents of 110.0 gallons per unit and 0.0041 units per hour. Emission unit P-2 exhausts at thirty two (32) roof vents identified as Stack/Vent P-2-1 through Stack Vent P-2-32. The surface coating of the exterior of aerospace vehicles also includes natural gas fired make-up air heating units with a combined maximum heat input rate of 36.0 million Btu per hour identified as emission unit B-1. Emission unit P-2 and Emission unit B-1 are each approved to construct in 2008.

Specifically Regulated Insignificant Activities:

- (d) Cleaners and solvents characterized as having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F) or having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months. Cleaning operations include hand wiping and spray gun cleaning. These activities are located in Hangar 1, 2, 3, 5 and 6 and in emission unit P-2. Potential VOC emissions are less than 3 pounds per hour and potential HAP emissions are less than 1 ton per year. [40 CFR 63, Subpart GG][326 IAC 20]

**Enforcement Issues**

There are no pending enforcement actions for AAR related to this modification.

**Stack Summary**

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
P-2-1 through P-2-32	Paint booth	50	2.66 (each)	1000	Ambient
NA	natural gas fired make-up air heating	NA	NA	NA	Ambient

**Emission Calculations**

See Appendix A (pages 1 through 5 of 5) of this document for detailed emission calculations.

**Permit Level Determination – Part 70**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission 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, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	1.22
PM10	2.12
SO <sub>2</sub>	0.09
VOC	12.95
CO	13.25
NO <sub>x</sub>	15.77

HAPs	Potential To Emit (tons/year)
Highest Single HAP (Xylene)	0.44
Combined HAP	1.10

This source modification is subject to 326 IAC 2-7-10.5(d)(3) & (d)(6) because the potential to emit VOC and NO<sub>x</sub> are each less than twenty five (25) tons per year but equal to or greater than ten (10) tons per year (see TSD Appendix A page 5 of 5). In addition, both the existing source and the modification are subject to a NESHAP, 40 CFR 63.741, Subpart GG, and the NESHAP is the most stringent applicable requirement. Therefore, the addition of emission unit B-1 and emission unit P-2 qualifies as a minor source modification. This minor source modification will be incorporated into the administrative Part 70 Operating Permit for AAR, T097-22389-00559, through a significant permit modification issued pursuant to 326 IAC 2-7-12(d) because the modification involves significant changes to record keeping requirements in the administrative Part 70 permit for AAR. The minor source modification is assigned the application tracking number of MSM097-25415-00559 and the significant permit modification is assigned the application tracking number of SPM097-25436-00559.

**Permit Level Determination – PSD or Emission Offset**

The table below summarizes the potential to emit, reflecting all limits, of the proposed emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 Significant Permit Modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential to Emit (tons/year)					
	PM	PM10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
<b>Emission Unit B-1</b>	0.30	1.20	0.09	0.87	13.25	15.77
<b>Emission Unit P-2</b>	0.92	0.92	0.00	12.08	0.00	0.00
<b>Total for Modification</b>	1.22	2.12	0.09	12.95	13.25	15.77
<b>PSD &amp; Nonattainment New Source Review Significant Level</b>	25	15	40	40	100	40

\* There is no increase in emissions from increased utilization due to this modification.

- (a) This modification to an existing major stationary source is not major, under 326 IAC 2-2, because the emission increases of PM, PM10, SO<sub>2</sub>, VOC, NO<sub>x</sub> and CO, are each less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) Marion County has been designated as nonattainment for PM 2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM, OAQ and OES will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit one hundred (100) tons per year of any nonattainment regulated pollutant. IAA has the potential to emit of PM10 below one hundred (100) tons per year. Therefore, assuming that PM10 emissions represent PM2.5 emissions, 326 IAC 2-1.1-5 does not apply for PM2.5.

**Federal Rule Applicability Determination**

The following federal rules are applicable to the source due to this modification:

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR 60) included in this proposed permit modification.
- (b) Emission unit P-2 is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63.741, Subpart GG (National Emission Standards for Aerospace Manufacturing and Rework Facilities) and IAC 20-15 (Aerospace Manufacturing and Rework Facilities). Nonapplicable portions of the NESHAP will not be included in the permit. Applicable portions are as follows:
  - (1) Except for coating and coating operations listed in 40 CFR 63.742 or those coatings or coating operations listed in 40 CFR 63.741(f), the following conditions apply to uncontrolled primer coating operations. Organic HAP and VOC content limits: 350 grams/liter (2.9 lb/gal less water for HAP and less water and exempt solvents for VOC) as applied. Compliance shall be achieved through:
    - (A) using coatings below content limits, or
    - (B) using monthly volume weighted averaging (primers only) to meet content limits. [40 CFR 63.745(e)]
  - (2) Except for the use of specialty coatings as defined in 40 CFR 63.742 or those coatings or coating operations listed in 40 CFR 63.741(f), the following conditions apply to uncontrolled topcoat coating operations. Organic HAP and VOC content limit: 420 g/l (3.5 lb/gal less water for HAP, and less water and exempt solvents for VOC) as applied. [40 CFR 63.745(c)(3),(4)] Compliance shall be achieved through:
    - (A) using coatings below content limits, or
    - (B) Using monthly volume weighted averaging (topcoats) to meet content limits. [40 CFR 63.745(e)]
  - (3) With respect to all coating applications operations, the following conditions apply:
    - (A) Pursuant to 40 CFR 63.745(b), minimize spills during handling and transfer of all materials. Pursuant to 40 CFR 63.748 minimize spills during handling and transfer of waste materials which contain HAPs.
    - (B) Pursuant to 40 CFR 63.745(f)(1), specific application techniques must be used.
    - (C) Pursuant to 40 CFR 63.745(f)(2), all application equipment must be operated according to manufacturer's specifications, company procedures, or operating procedures (whichever is more stringent).
    - (D) Pursuant to 40 CFR 63.745(g)(2), operating requirements must be followed for the application of primers or topcoats that contain inorganic HAP, including control with particulate filters (see Tables 1 through 4 of 40 CFR 63.745). Painting operation(s) must be shutdown if operated outside manufacturer's specified limits.
  - (4) Pursuant to 40 CFR 63.746, the following conditions apply to the depainting of the outer surface areas of completed aerospace vehicles:
    - (A) Except as provided below, the depainting operation in emission unit P-2 shall emit no organic HAP from chemical stripping formulations and agents or chemical paint softeners.

- (B) Where non-chemical based equipment is used to comply with the no organic HAP limit, either in total or in part, the permittee shall operate and maintain the equipment according to the manufacturer's specifications or locally prepared operating procedures. During periods of malfunctions of such equipment, the permittee may use substitute materials during the repair period provided the substitute materials used are those available that minimize organic HAP emissions. In no event shall substitute materials be used for more than 15 days annually, unless such materials are organic HAP-free.
- (C) The permittee shall not, on an annual average basis, use more than 26 gallons of organic HAP-containing chemical strippers or alternatively 190 pounds of organic HAP per commercial aircraft depainted; or more than 50 gallons of organic HAP-containing chemical strippers or alternatively 365 pounds of organic HAP per military aircraft depainted for spot stripping and decal removal.
- (D) Depainting operations in emission unit P-2 must comply with the inorganic HAP requirements specified in 40 CFR 63.746(b)(4).
- (E) Pursuant to 40 CFR 63.746, the following activities are exempt from depainting requirements:
  - (i) Depainting of radomes.
  - (ii) Depainting of parts, subassemblies, and assemblies normally removed from the primary aircraft structure before depainting.
  - (iii) Depainting of parts or units normally removed from the aerospace vehicle for depainting. However, depainting of wings and stabilizers is always subject to the requirements of 40 CFR 63.746 regardless of whether their removal is considered by the Permittee to be normal practice for depainting.
- (c) The National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63.11169, Subpart HHHHHH (National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating at Area Sources) is not included for emission unit P-2 in this proposed modification because AAR does not use methylene chloride in paint stripping (depainting) and does not use surface coatings that contain chromium, lead manganese, nickel or cadmium.
- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
  - (1) has a potential to emit (PTE) before controls equal to or greater than the major source threshold for the pollutant involved;
  - (2) is subject to an emission limitation or standard for that pollutant; and
  - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each modified emission unit involved:

Emission Unit - Pollutant with an Emission Limitation	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
P-2 (VOC)	N	Y	12.08	12.08	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the new units included in this minor source modification, MSM097-254364-00559.

**State Rule Applicability Determination**

The following state rules are applicable to the source due to the modification:

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

Marion County has been designated as nonattainment for PM2.5. According to an EPA guidance memo dated April 5, 2005, PM10 is to be utilized as a surrogate for PM2.5 until the EPA can promulgate the PM2.5 implementation rule. PM10 emissions, and therefore PM2.5 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 PM2.5 emissions.

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

This source is an existing major stationary source, under 326 IAC 2-2, because an attainment regulated pollutant, NO<sub>x</sub>, is equal to or greater than two hundred fifty (250) tons per year. The nested fossil fuel fired boilers at this source is in one of the 28 listed source categories in 326 IAC 2-2-1(gg)(1) (fossil fuel fired boilers (or combinations thereof) totalling more than two hundred fifty million (250,000,000) British thermal units per hour heat input). The potential to emit NO<sub>x</sub> and CO from the nested fossil fuel fired boilers are each greater than one hundred (100) tons per year. Therefore, the nested fossil fuel fired boilers are a major stationary source, under 326 IAC 2-2. There have been no modifications or revisions to this source that were major modifications pursuant to 326 IAC 2-2.

This modification to an existing major stationary source is not major, under 326 IAC 2-2, because the emission increases of PM, PM10, SO<sub>2</sub>, VOC, NO<sub>x</sub> and CO, are each less than the PSD significant levels (see Permit Level Determination – PSD or Emission Offset section). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

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

This potential to emit from this modification and this existing minor stationary source will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply to this source.

**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 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)**

This modification is not subject to 326 IAC 6-2 because emission unit B-1 is not a source of indirect heating. Therefore, emission unit B-1 is not subject to 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating).

**326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)**

This modification is not subject to 326 IAC 6-3-2 because the potential to emit particulate from emission unit P-2 is less than 0.551 pounds per hour (see Appendix A page 3 of 5). Therefore, emission unit P-2 is not subject to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)

**326 IAC 6-4 (Fugitive Dust Emissions)**

This source is subject to the provisions of 326 IAC 6-4 for fugitive dust emissions. The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right of way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**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 pages 1, 4 and 10). AAR 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.

**326 IAC 8-1-6 (General Volatile Organic Compound Reduction Requirements)**

This source commenced construction and operation after to January 1, 1980. This modification does not have the potential to emit twenty five (25) tons per year or more of volatile organic compounds (VOC) and is not otherwise regulated by other provisions of 326 IAC 8 (Volatile Organic Compound Rules). Therefore, this source is not subject to 326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities).

**326 IAC 8-2-9 (Surface Coating Emission Limitations: Miscellaneous Metal Coating Operations)**

Pursuant to 326 IAC 8-2-9(b), the surface coating of the exterior of airplanes is exempt from requirements of 326 IAC 8-2-9. Therefore, 326 IAC 8-2-9 (Surface Coating Emission Limitations: Miscellaneous Metal Coating Operations) is not applicable to this modification.

**326 IAC 11 (Emission Limitations for Specific Types of Operations)**

This aerospace vehicle rework facility does not perform any specific type of operation identified in 326 IAC 11. Therefore, this source is not subject to 326 IAC 11 (Emission Limitations for Specific Types of Operations).

**326 IAC 12 (New Source Performance Standards)**

See Federal Rule Applicability Determination section of this Technical Support Document.

**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).

**IAC 20-15 (Aerospace Manufacturing and Rework Facilities).** See Federal Rule Applicability Determination section of this Technical Support Document.

### Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ and OES, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The Compliance Determination Requirements applicable to this permit modification are as follows:

- (a) Pursuant to 40 CFR 63.749(d)(1), for uncontrolled coatings that are not averaged, each 24 hour period is considered a performance test; for uncontrolled coatings which are averaged, each 30 day period is considered a performance test. An organic HAP content level determination is made pursuant to 40 CFR 63.750(c) and (d), and a VOC content level determination is made pursuant to 40 CFR 63.750(e) and (f). An initial performance test is required for all control devices used to control VOC and organic HAPs to demonstrate compliance with overall control efficiency requirements, pursuant to 40 CFR 63.749(d)(2).
- (b) An affected hand wipe cleaning operation shall be considered in compliance when all hand wipe cleaning solvents, excluding those used for hand wipe cleaning of spray gun equipment under 40 CFR 63.744(c), meet either the composition requirements specified in 40 CFR 63.744(b)(1) or the vapor pressure requirement specified in 40 CFR 63.744(b)(2).
- (c) An affected spray gun cleaning operation shall be considered in compliance when each of the following conditions is met:
  - (1) One of four techniques specified in 40 CFR 63.744(c)(1) through (c)(4) is used:
  - (2) The technique selected is operated according to the procedures specified in 40 CFR 63.744(c)(1) through (c)(4) as appropriate; and
  - (3) If an enclosed system is used, monthly visual inspections are conducted and any leak detected is repaired within 15 days after detection. If the leak is not repaired by the 15th day after detection, the solvent shall be removed and the enclosed cleaner shall be shutdown until the cleaner is repaired or its use is permanently discontinued.
- (d) An affected flush cleaning operation shall be considered in compliance if the operating requirements specified in 40 CFR 63.744(d) are implemented and carried out.
- (e) Permittee shall make composition determinations using manufacturing data [40 CFR 63.750(a)] or a vapor Pressure determination using readily available sources such as MSDS if single component; composite vapor pressure determined by manufacturer's supplied data or ASTM E 260-91 and by equation provided for multiple component

solvents. [40 CFR 63.750(b)]

The Compliance Monitoring requirements applicable to this permit modification are as follows:

- (a) Pursuant to 40 CFR 63.751(c)(1) and 40 CFR 63.751(d), the Permittee shall, while the primer, topcoat application operations and repainting operations are occurring, continuously monitor the pressure drop across the system, and read and record pressure drop once per shift.
- (b) Permittee shall conduct monthly visual leak inspection for enclosed spray gun cleaners in accordance with the requirements of 40 CFR 63.751(a).

These monitoring conditions are necessary to ensure compliance with 40 CFR 63.741, Subpart GG (National Emission Standards for Aerospace Manufacturing and Rework Facilities) and 326 IAC 20-15 (Aerospace Manufacturing and Rework Facilities).

### Proposed Changes

The changes listed below have been made to the IMCCEP Administrative Part 70 Operating Permit No. T097-22919-00586. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

#### Change 1

On November 30, 2006, IDEM, OAQ and OES issued Part 70 Administrative Amendment, 097-22919-00586, to BHMM Energy Services, LLC (now referred to as BHMM Energy Services, LLC - IMC Central Energy Plant). This amendment served to transfer operational control of the central energy plant at the aerospace vehicle maintenance center from IAA to BHMM. As a result, this aerospace vehicle maintenance center and airfield source now consists of four (4) plants and not three (3) plants as previously referenced in Condition A.2.

On August 8, 2007, IDEM, OAQ and OES issued Significant Permit Modification No. 097-23240-00156 to IAA to incorporate existing collocated insignificant activities at the airfield located at 2500 South High School Road, Indianapolis, Indiana 46241. This change affects the Title page address of the source, the address of the source in Conditions A.1 and A.2, and the source address in all reporting forms in this proposed source modification and permit modification for AAR.

Since this source consists of "fossil fuel fired boilers (or combinations thereof) totalling more than two hundred fifty million (250,000,000) British thermal units per hour heat input," it is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1) and 326 IAC 2-3-2(g)(26). This source has the potential to emit VOC, NO<sub>x</sub> and CO of greater than one hundred (100) tons per year but less than two hundred fifty (250) tons per year. Marion County is classified as attainment for NO<sub>x</sub> and CO. As a result, this source is a major source under PSD rules. Condition A.1 had stated that this source was a minor source under PSD. Condition A.1 has been updated to clarify that the source is a major source under PSD.

The potential to emit PM<sub>10</sub>, as a surrogate for PM<sub>2.5</sub>, is less than one hundred (100) tons per year. Therefore, it is a minor source under Nonattainment New Source Review rules. Nonattainment New Source Review source status for PM<sub>2.5</sub> is added to Condition A.1.

On November 8, 2007, a temporary emergency rule took effect redesignating Marion County to attainment for the eight-hour ozone standard. The Indiana Air Pollution Control Board has begun the process for a permanent rule revision to incorporate these changes into 326 IAC 1-4-1. The permanent revision to 326 IAC 1-4-1 should take effect prior to the expiration of the emergency rule. Therefore, Marion County is no longer nonattainment for ozone under the 8-hour standard. In addition, IDEM, OAQ and OES no longer list the names or titles of the Responsible Official in permits. Therefore, Condition A.1 and Condition A.2 are revised as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

~~The Permittee owns and operates a~~ **This source consists of an airfield, a stationary aerospace vehicle maintenance center which performs various maintenance tasks on aircraft and a central energy plant.**

Responsible Official: ~~General Manager~~  
Source Address: 2825 West Perimeter Road, Indianapolis, Indiana 46241, **2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241, and 2500 South High School Road, Indianapolis, Indiana 46241**  
Mailing Address: 2825 West Perimeter Road, **Suite 101**, Indianapolis, Indiana 46241  
General Source Phone Number: (317) 693-8851  
SIC Code: 3721  
County Location: Marion  
Source Location Status: ~~Nonattainment for ozone under the 8-hour standard~~  
~~Nonattainment for PM2.5~~  
Attainment for all other criteria pollutants.  
Source Status: Part 70 Permit Program  
~~Minor~~ **Major** Source, Section 112 of the Clean Air Act and **Nonattainment New Source Review**  
~~Major Source under Emission Offset Rules~~  
~~Major~~ **Minor** Source under PSD Rules  
**Nested Source with fossil fuel fired boilers (or combinations thereof) totalling more than two hundred fifty million (250,000,000) British thermal units per hour heat input, as 1 of 28 Source Categories**

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This **airfield, aerospace vehicle maintenance center and central energy plant** source consists of **four (4)** ~~three (3)~~ plants:

- (a) Plant 1, Indianapolis Airport Authority (097-21243-00156), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241 **and 2500 South High School Road (and various collocated addresses), Indianapolis, Indiana 46241;**
- (b) **Plant 2, BHMM Energy Services, LLC - IMC Central Energy Plant (097-00586), is located at 2745 South Hoffman Road, Suite 504, Indianapolis, Indiana 46241;**
- (c) ~~(b)~~ Plant **32**, AAR Aircraft Services, Indianapolis (097-21245-00559), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241; and
- (d) ~~(c)~~ Plant **43**, Indianapolis Diversified Machining, Inc. (097-21325-00560), is located at 2825 West Perimeter Road, Indianapolis, Indiana 46241.

IDEM, OAQ and OES have determined that since the **four (4)** ~~three (3)~~ plants are located on contiguous or adjacent properties and are under common control of the same entity, the Indianapolis Airport Authority, they will be considered one (1) source, effective from the date of issuance of this Part 70 Operating Permit Amendment. These **four (4)** ~~three (3)~~ plants are considered one source because **BHMM Energy Services, LLC - IMC Central Energy Plant** the ~~on-site powerhouse~~ is dedicated to the aerospace vehicle maintenance center and AAR Aircraft Services, Indianapolis will occupy the majority of the aircraft hangars at the maintenance center. Indianapolis Diversified Machining, Inc. receives from AAR Aircraft Services, Indianapolis more than fifty percent (50%) of its work flow and supplies these goods and services back to AAR Aircraft Services, Indianapolis. Therefore, the term "source" in the Part 70 documents refers to

the Indianapolis Airport Authority, **BHMM Energy Services, LLC - IMC Central Energy Plant**, AAR Aircraft Services, Indianapolis and Indianapolis Diversified Machining, Inc. as one source.

Separate Part 70 permits will be issued to Indianapolis Airport Authority with Permit No.: 097-21243-00156, **BHMM Energy Services, LLC - IMC Central Energy Plant with Permit No.: 097-25234-00586**, AAR Aircraft Services, Indianapolis with Permit No.: 097-~~25436~~24245-00559 and Indianapolis Diversified Machining, Inc. with Permit No.: 097-21325-00560 solely for administrative purposes.

## Change 2

The request to add emission unit P-2 and emission unit B-1 to the permit causes the following revision to Condition A.3 and Condition A.4 as follows:

### A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

---

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

- (a) Five (5) service hangars with activities relating to the coating of aircraft parts identified as emissions unit EU-013, service hangars 1, 2, 3, 5 and 6 are used for routine and nonroutine maintenance, with paint booths using high volume, low pressure (HVLP) spray application systems. The table below summarizes the startup dates for each hangar:

Hangar	Date Operation Began
Hangar 1	March 27, 1994
Hangar 2	December 13, 1994
Hangar 3	February 15, 1995
Hangar 5	September 1, 1995
Hangar 6	December 13, 1996

- (b) **One (1) paint booth, identified as emission unit P-2, for surface coating the exterior of aerospace vehicles. Emission unit P-2 is located in Hangar 5 and has a maximum surface coating capacity of 58.0 gallons of coating per unit and 0.0041 units per hour. Emission unit P-2 utilizes high volume, low pressure (HVLP) spray application systems and is equipped with dry filters for particulate overspray control. Emission unit P-2 includes the use of surface coating stripper solvents for repainting operations that do not contain HAP with maximum usage of stripper solvents of 110.0 gallons per unit and 0.0041 units per hour. Emission unit P-2 exhausts at thirty two (32) roof vents identified as Stack/Vent P-2-1 through Stack Vent P-2-32. The surface coating of the exterior of aerospace vehicles also includes natural gas fired make-up air heating units with a combined maximum heat input rate of 36.0 million Btu per hour identified as emission unit B-1. Emission unit P-2 and Emission unit B-1 are each approved to construct in 2008.**

### A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

---

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

...

- (d) Cleaners and solvents characterized as having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F) or having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months. Cleaning operations include hand wiping and spray gun cleaning. These activities are located in Hangar 1, 2, 3, 5 and 6 **and in emission unit P-2**. Potential VOC emissions are less than 3 pounds per hour and potential HAP emissions are less than 1 ton per

year. [40 CFR 63, Subpart GG][326 IAC 20]

### Change 3

326 IAC 4 and 326 IAC 9 were approved into the Indiana State Implementation Plan (SIP) and became effective on January 31, 2005. Therefore, Conditions C.3 and C.4 have been revised as follows:

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. ~~326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.~~

#### C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. ~~326 IAC 9-1-2 is not federally enforceable.~~

### Change 4

On January 22, 2008 U.S. EPA promulgated a rule to address the remand, by the U.S. Court of Appeals for the District of Columbia on June 25, 2005, of the reasonable possibility provisions of the December 31, 2002 major NSR reform rule. IDEM has agreed, with U.S. EPA, to interpret "reasonable possibility" in 326 IAC 2-2 and 326 IAC 2-3 consistent with the January 22, 2008 U.S. EPA rule. To implement this interpretation, IDEM is revising Section C.21 - General Record Keeping Requirements and Section C.22 - General Reporting Requirements as follows:

#### C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2][326 IAC 2-3]

---

...

**(c) If there is a reasonable possibility (as defined in 40 CFR 51.165 (a)(6)(vi)(A), 40 CFR 51.165 (a)(6)(vi)(B), 40 CFR 51.166 (r)(6)(vi)(a), and/or 40 CFR 51.166 (r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:**

**(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:**

**(A) A description of the project.**

**(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.**

**(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:**

**(i) Baseline actual emissions;**

**(ii) Projected actual emissions;**



- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in an applicable rule.
- (f) **If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ and OES.**
  - (1) **The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and**
  - (2) **The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).**
- (g) **The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:**
  - (1) **The name, address, and telephone number of the major stationary source.**
  - (2) **The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.**
  - (3) **The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).**
  - (4) **Any other information that the Permittee deems fit to include in this report.**

**Reports required in this part shall be submitted to:**

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

**and**

**Indianapolis OES  
Air Compliance  
2700 South Belmont Ave.  
Indianapolis, IN 46221**

- (h) **The report for a project at an existing emissions unit other than Electric Utility Steam Generating Unit shall be submitted within sixty (60) days after the end of the year and contain the following:**

- (1) **The name, address, and telephone number of the major stationary source.**
- (2) **The annual emissions calculated in accordance with (c)(2) and (3) in Section C -General Record Keeping Requirements.**
- (3) **The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).**
- (4) **Any other information that the Permittee deems fit to include in this report,**

**Reports required in this part shall be submitted to:**

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

**and**

**Indianapolis OES  
Air Compliance  
2700 South Belmont Ave.  
Indianapolis, IN 46221**

- (i) **The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C - General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ and OES. The general public may request this information from the IDEM, OAQ and OES under 326 IAC 17.1.**

Change 5

IDEM, OAQ has an updated mail address. Mail code MC 61-53 IGCN 1003 is inserted in the mail address for the Permits Branch, Compliance Branch and Compliance Data Section. Mail code MC 61-50 IGCN 1003 is inserted in the mail address for the Technical Support and Modeling Section. Mail code MC 61-52 IGCN 1003 is inserted in the mail address for the Asbestos Section. The change in mail address affects Conditions, B.7, B.10, B.11, B.12, B.15, B.17, B.18, B.20, B.23, C.8, C.9, C.11, C.20 and C.22 as follows;

Asbestos Section:	<b>MC 61-52 IGCN 1003</b>
Compliance Branch:	<b>MC 61-53 IGCN 1003</b>
Permits Branch:	<b>MC 61-53 IGCN 1003</b>
Technical Support and Modeling Section:	<b>MC 61-50 IGCN 1003</b>

Change 6

The change in mail address affects the Certification Report Form as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178**

Fax: 317-233-6865

### Change 7

Condition B.2 (Permit Term) has been revised to more clearly state that the permit being modified was originally issued to the Indianapolis Airport Authority on June 26, 2003 and expires five (5) years from the issuance date of T097-9602-00156 and not five years from the issuance date of the collocated source administrative amendment, T097-22389-00559, issued on December 29, 2005.

#### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

---

- (a) This permit, T097-9602-00156 (**as amended in Part 70 Operating Permit Administrative Amendment No. T097-22389-00559, issued on December 29, 2005**), is issued for a fixed term of five (5) years from the issuance date of this permit, **as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.**

...

### Change 8

IDEM, OAQ has updated the telephone number stated in Condition B.11 (Emergency Provisions) and in the Certification Report Form as follows:

#### B.12 Emergency Provisions [326 IAC 2-7-16]

---

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and OES within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for IDEM, OAQ, Compliance Section),  
or:

Telephone Number: 317-233-~~01785674~~ (ask for IDEM, OAQ, Compliance Section)

Facsimile Number: 317-233-~~68655967~~;

...

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-01785674  
Fax: 317-233-68655967

Change 9

The typographical error in Condition D.1.9 (Record Keeping) is corrected and emission unit P-2 and emission unit B-1 are added to Section D.1 and Section D.4 as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) Five (5) service hangars with activities relating to the coating of aircraft parts identified as missions unit EU-013, service hangars 1, 2, 3, 5 and 6 are used for routine and non routine maintenance, with paint booths using high volume, low pressure (HVLP) spray application systems. The table below summarizes the startup dates for each hangar:

Hangar	Date Operation Began
Hangar 1	March 27, 1994
Hangar 2	December 13, 1994
Hangar 3	February 15, 1995
Hangar 5	September 1, 1995
Hangar 6	December 13, 1996

- (b) **One (1) paint booth, identified as emission unit P-2, for surface coating the exterior of aerospace vehicles. Emission unit P-2 is located in Hangar 5 and has a maximum surface coating capacity of 58.0 gallons of coating per unit and 0.0041 units per hour. Emission unit P-2 utilizes high volume, low pressure (HVLP) spray application systems and is equipped with dry filters for particulate overspray control. Emission unit P-2 includes the use of surface coating stripper solvents for depainting operations that do not contain HAP with maximum usage of stripper solvents of 110.0 gallons per unit and 0.0041 units per hour. Emission unit P-2 exhausts at thirty two (32) roof vents identified as Stack/Vent P-2-1 through Stack Vent P-2-32. The surface coating of the exterior of aerospace vehicles also includes natural gas fired make-up air heating units with a combined maximum heat input rate of 36.0 million Btu per hour identified as emission unit B-1. Emission unit P-2 and Emission unit B-1 are each approved to construct in 2008.**

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

Emission Limitations and Standards [326 IAC 2-7-5(1)]

...

D.1.2 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to **emission unit EU-013 and emission unit P-2** as the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart GG, Table 1.

D.1.3 Aerospace NESHAP [40 CFR 63 Subpart GG] [326 IAC 20]

This source is subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63.741, Subpart GG), even though HAP emissions are less than the major source

thresholds, because the potential to emit HAPs at the time of rule promulgation was assumed to be greater than the major source thresholds (based on EPA determination). **Emission unit EU-013 and emission unit P-2 are subject to the following requirements:**

...

- (d) Pursuant to 40 CFR 63.746, the following conditions apply to the depainting of the outer surface areas of completed aerospace vehicles:
- (1) Except as provided by Condition D.1.3(d)(2) and D.1.3(d)(3), the depainting operation in emission unit P-2 shall emit no organic HAP from chemical stripping formulations and agents or chemical paint softeners.
  - (2) Where non-chemical based equipment is used to comply with Condition D.1.3(d)(1), either in total or in part, the permittee shall operate and maintain the equipment according to the manufacturer's specifications or locally prepared operating procedures. During periods of malfunctions of such equipment, the permittee may use substitute materials during the repair period provided the substitute materials used are those available that minimize organic HAP emissions. In no event shall substitute materials be used for more than 15 days annually, unless such materials are organic HAP-free.
  - (3) The permittee shall not, on an annual average basis, use more than 26 gallons of organic HAP-containing chemical strippers or alternatively 190 pounds of organic HAP per commercial aircraft depainted; or more than 50 gallons of organic HAP-containing chemical strippers or alternatively 365 pounds of organic HAP per military aircraft depainted for spot stripping and decal removal.
  - (4) Depainting operations in emission unit P-2 must comply with the inorganic HAP requirements specified in 40 CFR 63.746(b)(4).
  - (5) Pursuant to 40 CFR 63.746, the following activities are exempt from depainting requirements:
    - (A) Depainting of radomes.
    - (B) Depainting of parts, subassemblies, and assemblies normally removed from the primary aircraft structure before depainting.
    - (C) Depainting of parts or units normally removed from the aerospace vehicle for depainting. However, depainting of wings and stabilizers is always subject to the requirements of 40 CFR 63.746 regardless of whether their removal is considered by the Permittee to be normal practice for depainting.

D.1.4 Particulate [326 IAC 6-3-2(d)]

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Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating processes in **emission unit EU-013** shall be controlled by a dry particulate filter control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan, in accordance with Section B.12 - Preventive Maintenance Plan, of this permit, is required for **surface coating processes in emission unit EU-013 and emission unit P-2** ~~this facility~~ and ~~its~~ control devices.

...

D.1.8 Dry Particulate Filters [40 CFR 63, Subpart GG][326 IAC 20]

---

Pursuant to 40 CFR 63.751(c)(1) and 40 CFR 63.751(d), the Permittee shall, while the primer, or topcoat application operations and **depainting operations** are occurring, continuously monitor the pressure drop across the system, and read and record pressure drop once per shift.

#### D.1.9 Record Keeping Requirements

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- ...
- (e) Pursuant to Conditions D.1.4, D.1.8 ~~D.1.1, D.1.3~~, and 40 CFR 63.751(c)(1) and **40 CFR 63.752(d)(1)**, the Permittee shall maintain a record of the pressure drop readings taken once per shift while the primer or topcoat applications are occurring.
- (f) Pursuant to 40 CFR 63.752(e), the Permittee shall record the information specified in (1) through (5) for **depainting operations**:
- (1) For all chemical strippers used in the **depainting operation**:
    - (A) The name of each chemical stripper; and
    - (B) Monthly volumes of each organic HAP containing chemical stripper used or monthly weight of organic HAP-material used for spot stripping and decal removal.
  - (2) For HAP-containing chemical strippers that are controlled by a dry particulate filter:
    - (A) The overall control efficiency of the control system (as determined using the procedures specified in §63.750(h)) and all test results, data, and calculations used in determining the overall control efficiency;
  - (3) For each type of aircraft depainted at the facility, a listing of the parts, subassemblies, and assemblies normally removed from the aircraft before depainting. Prototype, test model or aircraft that exist in low numbers (i.e., less than 25 aircraft of any one type) are exempt from this requirement.
  - (4) If dry media blasting equipment is used to comply with the organic HAP emission limit specified in 40 CFR 63.746(b)(1):
    - (A) The names and types of non-chemical based equipment; and
    - (B) For periods of malfunction,
      - (i) The non-chemical method or technique that malfunctioned;
      - (ii) The date that the malfunction occurred;
      - (iii) A description of the malfunction;
      - (iv) The methods used to depaint aerospace vehicles during the malfunction period;
      - (v) The dates that these methods were begun and discontinued; and
      - (vi) The date that the malfunction was corrected.
  - (5) For spot stripping and decal removal, the volume of organic HAP-containing chemical stripper or weight of organic HAP used, the annual average volume of organic HAP-containing chemical stripper or weight of

**organic HAP used per aircraft, the annual number of aircraft stripped, and all data and calculations used.**

- (g) (f)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.1.10 Reporting Requirements**

---

...

- (d)** Pursuant to 40 CFR 63.753(d), the permittee shall submit the following information for the depainting operation in emission unit P-2:
- (1)** Semiannual reports occurring every 6 months from the date of the notification of compliance status that identify:
- (A)** Any 24-hour period where organic HAP were emitted from the depainting of aerospace vehicles, other than from the exempt operations listed in 40 CFR 63.746 (a), (b)(3), and (b)(5).
  - (B)** Any new chemical strippers used at the facility during the reporting period;
  - (C)** The organic HAP content of these new chemical strippers;
  - (D)** For each chemical stripper that undergoes reformulation, its organic HAP content;
  - (E)** Any new non-chemical depainting technique in use at the facility since the notification of compliance status or any subsequent semiannual report was filed;
  - (F)** For periods of malfunctions:
    - (i)** The non-chemical method or technique that malfunctioned;
    - (ii)** The date that the malfunction occurred;
    - (iii)** A description of the malfunction;
    - (iv)** The methods used to depaint aerospace vehicles during the malfunction period;
    - (v)** The dates that these methods were begun and discontinued; and
    - (vi)** The date that the malfunction was corrected;
  - (G)** All periods where a nonchemical depainting operation subject to 40 CFR 63.746(b)(2) and (b)(4) for the control of inorganic HAP emissions was not immediately shut down when the pressure drop, water flow rate, or recommended booth parameter(s) was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operational procedures;
  - (H)** A list of new and discontinued aircraft models depainted at the facility over the last 6 months and a list of the parts normally removed for depainting for each new aircraft model being depainted; and

- (1) **If the depainting operation has been in compliance for the semiannual period, a statement signed by a responsible company official that the operation was in compliance with the applicable standards.**
- (2) **Annual reports occurring every 12 months from the date of the notification of compliance status that identify:**
  - (A) **The average volume per aircraft of organic HAP-containing chemical strippers or weight of organic HAP used for spot stripping and decal removal operations if it exceeds the limits specified in §63.746(b)(3); and**
  - (B) **The number of times the pressure drop limit(s) for each filter system or the number of times the water flow rate limit(s) for each waterwash system were outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures.**

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Specifically regulated insignificant activity:

- (d) Cleaners and solvents characterized as having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F) or having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months. Cleaning operations include hand wiping and spray gun cleaning. These activities are located in Hangar 1, 2, 3, 5 and 6 **and in emission unit P-2**. Potential VOC emissions are less than 3 pounds per hour and potential HAP emissions are less than 1 ton per year. [40 CFR 63, Subpart GG][326 IAC 20]

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

**Conclusion and Recommendation**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 minor source modification No. MSM097-25415-00559. The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 significant permit modification No. SPM097-25436-00559. The staff recommend to the IDEM Commissioner and OES Administrator that this Part 70 significant source modification and significant permit modification be approved.

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

**Company Name:** AAR Aircraft Services, Indianapolis  
**Address City IN Zip:** 2825 West Perimeter Road, Indianapolis, Indiana 46241  
 2745 South Hoffman Road, Suite 504, Indianapolis Indiana 46241  
 2500 South High School Road, Indianapolis, Indiana 46241  
**Permit Modification Number:** 097-25436-00559  
**Source Modification Number:** 097-25415-00559  
**Plt ID:** 097-00559  
**Reviewer:** M. Caraher  
**Date:** 12/19/2007

Combined  
Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

36.0

315.4

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.30	1.20	0.09	15.77	0.87	13.25

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

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

**HAPs Emissions**  
**Company Name:** AAR Aircraft Services, Indianapolis  
**Address City IN Zip:** 2825 West Perimeter Road, Suite 101, Indianapolis, Indiana 46241  
 2745 South Hoffman Road, Suite 504, Indianapolis Indiana 46241  
 2500 South High School Road, Indianapolis, Indiana 46241  
**Permit Modification Number:** 097-25436-00559  
**Source Modification Number:** 097-25415-00559  
**Plt ID:** 097-00559  
**Reviewer:** M. Caraher  
**Date:** 12/19/2007

HAPs - Organics					
Emission Factor in lb/MMCF	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	3.3E-04	1.9E-04	1.2E-02	2.8E-01	5.4E-04

HAPs - Metals						Combined HAP
Emission Factor in lb/MMCF	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	NA
Potential Emission in tons/yr	7.9E-05	1.7E-04	2.2E-04	6.0E-05	3.3E-04	3.0E-01

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above. Hexane is highest single HAP. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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

**Company Name: AAR Aircraft Services, Indianapolis**  
**Address City IN Zip: 2825 West Perimeter Road, Suite 101, Indianapolis, Indiana 46241**  
**2745 South Hoffman Road, Suite 504, Indianapolis Indiana 46241**  
**2500 South High School Road, Indianapolis, Indiana 46241**

**Permit Modification Number: 097-25436-00559**

**Source Modification Number: 097-25415-00559**

**Plt ID: 097-00559**

**Reviewer: M. Caraher**

**Date: 12/19/2007**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Stripper PR-2002	8.34	100.00%	44.4%	55.6%	44.4%	0.00%	110.00000	0.0041	8.34	4.64	9.18	0.00	0.00	0%
Primer	13.39	21.30%	0.0%	21.3%	0.0%	52.40%	14.00000	0.0041	2.85	2.85	0.72	0.27	5.44	90%
White Topcoat	11.12	26.00%	0.0%	26.0%	0.0%	57.92%	24.00000	0.0041	2.89	2.89	1.25	0.36	4.99	90%
Gray Topcoat	11.02	23.50%	0.0%	23.5%	0.0%	62.80%	20.00000	0.0041	2.59	2.59	0.93	0.30	4.12	90%

**State Potential Emissions**

**Add worst case coating to all solvents**

**12.08**

**0.92**

**METHODOLOGY**

Primer (14 gallons) + White Topcoat (24 gallons) + Gray Topcoat (20 gallons) = 58 gallons to paint one unit (plane).

Units/hour = max of 36 planes painted per year = 36 units/yr / year/8760 hours = 0.0041 units/hour.

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Transfer Efficiency = Air Pollution Engineering Manual (AWMA 1992) Chapter 10 Table 2, electrostatic painting and flat surfaces.

**Appendix A: Emission Calculations  
HAP Emission Calculations**

**Company Name:** AAR Aircraft Services, Indianapolis  
**Address City IN Zip:** 2825 West Perimeter Road, Suite 101, Indianapolis  
 2745 South Hoffman Road, Suite 504, Indianapolis Indiana 46241  
 2500 South High School Road, Indianapolis, Indiana 46241  
**Permit Modification Number:** 097-25436-00559  
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**Plt ID:** 097-00559  
**Reviewer:** M. Caraher  
**Date:** 12/19/2007

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (units/hour)	Weight % Xylene	Weight % MIBK	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)	Combined HAP (ton/yr)
White Topcoat	11.12	24.00	0.0041	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.24	0.00	0.00	0.00	0.00	0.00	0.00	0.24
Gray Topcoat	11.02	20.00	0.0041	5.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.20	0.40	0.00	0.00	0.00	0.00	0.00	0.60

METHODOLOGY

0.44

0.84

Potential HAP = Weight % HAP \* Density of coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

**Appendix A: Emission Calculations  
Summary**

**Company Name:** AAR Aircraft Services, Indianapolis  
**Address City IN Zip:** 2825 West Perimeter Road, Suite 101, Indianapolis, Indiana 46241  
 2745 South Hoffman Road, Suite 504, Indianapolis Indiana 46241  
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**Permit Modification Number:** 097-25436-00559  
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**Plt ID:** 097-00559  
**Reviewer:** M. Caraher  
**Date:** 12/19/2007

Potential to Emit Summary (tons per year)							Highest Single HAP	Combination HAP
	PM	PM10	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO		
<b>Emission Unit B-1</b>	0.30	1.20	0.09	15.77	0.87	13.25	2.8E-01	3.0E-01
<b>Emission Unit P-2</b>	0.92	0.92	0.00	0.00	12.08	0.00	4.4E-01	8.4E-01
<b>Potential to Emit</b>	<b>1.22</b>	<b>2.12</b>	<b>0.09</b>	<b>15.77</b>	<b>12.95</b>	<b>13.25</b>	<b>7.2E-01</b>	<b>1.1E+00</b>

Highest Single HAP from B-1 is Hexane.

Highest Single HAP from P-2 is Xylene.