



DATE: January 22, 2008
TO: Interested Parties / Applicant
RE: Foundry Services, Inc. / E097-25659-00636
FROM: Timothy J. Method
Environmental Coordinator
Department of Public Works
City of Indianapolis

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 501, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Indianapolis Office of Environmental Services, Air Permits at (317) 327-2234.

Enclosures



Air Quality Hotline: 317-327-4AIR | knozone.com

Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

317-327-2234
Fax 327-2274
TDD 327-5186
indygov.org/dpw



January 22, 2008

Mr. Michael Weir
Foundry Services, Inc.
625 North Tuxedo Street
Indianapolis, IN 46201

Certified Mail Number: 7007 0710 0005 3965 8958

Dear Mr. Weir:

Re: Exempt Construction and Operation Status,
E097-25659-00636

The application from Foundry Services, Inc., received on December 12, 2007, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following metal casting finishing operation, located at 625 North Tuxedo Street, Indianapolis, Indiana, is classified as exempt from air pollution permit requirements:

- (a) Fifty (50) handgrinders, identified as emission unit A, with a combined maximum capacity of 100,000 pounds per day.
- (b) One (1) Automatic Grinder, identified as emission unit B, with a maximum capacity of 70,000 pounds per day, installed in 2007, with emissions controlled by a dust collector, exhausting to stack/vent ID C.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (sixty (60) readings in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (2) Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

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



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An application or notification shall be submitted in accordance with 326 IAC 2 to the Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by

Timothy J. Method
Environmental Coordinator
Department of Public Works

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

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

Technical Support Document (TSD) for an Exemption

Source Background and Description

| | |
|------------------------------|--|
| Source Name: | Foundry Services, Inc. |
| Source Location: | 625 North Tuxedo, Indianapolis, Indiana 46201 |
| County: | Marion |
| SIC Code: | 3599 |
| Operation Permit No.: | E097-25659-00636 |
| Permit Reviewer: | A. Nguyen |

The Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed an application from Foundry Services, Inc. relating to the operation of a metal casting finishing operation.

Exempt Emission Units and Pollution Control Equipment

The source consists of the following exempt emission units:

- (a) Fifty (50) handgrinders, identified as emission unit A, with a combined maximum capacity of 100,000 pounds per day.
- (b) One (1) Automatic Grinder, identified as emission unit B, with a maximum capacity of 70,000 pounds per day, installed in 2007, with emissions controlled by a dust collector, exhausting to stack/vent ID C .

Existing Approvals

The source has not been operating under any previous or existing approvals.

Enforcement Issue

IDEM, OAQ, and OES are aware that equipment has been constructed and operated prior to receipt of the proper permit. However, the air emissions from the source have been evaluated and no air permit is needed. Therefore, no enforcement action is necessary.

Recommendation

The staff recommends to the Administrator that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on December 12, 2007.

Emission Calculations

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

Potential to Emit of the Source Before Controls

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

| Pollutant | Potential to Emit (tons/yr) |
|-----------------|-----------------------------|
| PM | 1.55 |
| PM10 | 1.55 |
| SO ₂ | 0.0 |
| VOC | 0.0 |
| CO | 0.0 |
| NO _x | 0.0 |

| HAPs | Potential to Emit (tons/yr) |
|--------|-----------------------------|
| Single | negligible |
| Total | negligible |

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated air pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than one (1) ton per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than two and a half (2.5) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3(e)(1)(H). An exemption will be issued.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Marion County.

| Pollutant | Status |
|-----------------|------------------------|
| PM10 | Attainment |
| PM2.5 | Nonattainment |
| SO ₂ | Maintenance attainment |
| NO _x | 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 Clark, Floyd, Elkhart, St. Joseph, LaPorte, Boone, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, and Shelby Counties as attainment for the 8-hour ozone standard.

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x 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_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section.

- (b) Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions, pursuant to the requirements of 326 IAC 2-1.1-5 (Non-attainment New Source Review). See the State Rule Applicability - Entire Source section.

- (c) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (d) Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

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

Source Status

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

| Pollutant | Emissions (tons/yr) |
|--------------------|---------------------|
| PM | 1.55 |
| PM ₁₀ * | 1.55 |
| SO ₂ | 0.0 |
| VOC | 0.0 |
| CO | 0.0 |
| NO _x | 0.0 |
| Single HAP | negligible |
| Combination HAPs | negligible |

* PM₁₀ is a surrogate for PM_{2.5}

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

- (b) This existing source is **not** a major stationary source under nonattainment new source review because PM10 (as a surrogate for PM2.5) is not emitted at a rate of 100 tons per year or greater. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

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

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

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this Exemption.
- (b) The requirements of National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundries 40 CFR 63.7680, Subpart EEEEE are not included in the permit because Foundry Services, In. is not considered an iron or steel foundry and is not a major source of hazardous air pollutants (HAPs).
- (c) The requirements of National Emission Standards for Hazardous Air Pollutants for Iron and Steel Foundry Area Sources 40 CFR 63.10880, Subpart ZZZZZ are not included in the permit because Foundry Services, Inc. is not considered an iron or steel foundry.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in this Exemption.

State Rule Applicability – Entire Source

326 IAC 2-1.1-5 (Air Quality Requirements)

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. 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))

This source is not a major source. This source is not one (1) of the twenty-eight (28) listed source categories. The potential to emit each criteria pollutant from the entire source is less than 250 tons per year and the potential to emit of lead is less than twenty five (25) tons per year. Therefore, this source is a minor source and the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) are not applicable.

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

This source will emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

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

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6.5-1-2 (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. Since the calculated potential particulate emission rate is less than ten (10) tons per year (see Appendix A, page 1), then actual emissions will be less than ten (10) tons per year. Foundry Services 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 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(14), manufacturing processes with the potential emissions less than five hundred fifty-one thousandths (0.551) pounds per hour of PM shall be exempt from 326 IAC 6-3. The grinding operations have potential PM emissions less than 0.551 pounds per hour (see Appendix A, page 1). Therefore, 326 IAC 6-3 does not apply.

326 IAC 6-4 (Fugitive Dust Emission Limitations)

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

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

This source commenced construction and operation after January 1, 1980. Neither the source nor any specific emission unit at this source has the potential to emit twenty five (25) tons per year or more of volatile organic compounds (VOC). Therefore, this source is not subject to 326 IAC 8-1-6 (General Provisions Relating to VOC Rules: General Reduction Requirements for New Facilities).

Conclusion

The construction and operation of this metal casting finishing operation shall be subject to the conditions of Exemption E097-25659-00636.

Appendix A: Emission Calculations

Company Name: Foundry Services, Inc.
Address City IN Zip: 625 North Tuxedo Street
Permit Number: E097-25659-00636
Plt ID: 097-00636
Reviewer: A. Nguyen
Date: 1/8/2008

| Emission Unit | Maximum Capacity (lbs/day) | Emission Factor (lb/ton) | Potential PM/PM10 Emissions (lb/hr) | Potential PM/PM10 Emissions (tons/yr) |
|--------------------------|----------------------------|--------------------------|-------------------------------------|---------------------------------------|
| 50 Hand Grinders (EU A) | 100,000 | 0.1 | 0.21 | 0.91 |
| Automatic Grinder (EU B) | 70,000 | 0.1 | 0.15 | 0.64 |
| Total | | | | 1.55 |

Methodology

Emission Factor taken from AP-42 Chapter 12.5, Table 12.5-1 (machine scarfing)

Potential Emissions (lbs/hr) = maximum capacity (lbs/day) x 1 ton/2000 lbs x emission factor (lb/ton) x 1 day/24 hours

Potential Emissions (tons/yr) = Potential Emissions (lbs/hr) x 8760 hrs/year x 1 ton/2000 lbs