



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: February 27, 2008

RE: Automated Machine Products / 123-25999-00027

FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Registration

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

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

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

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

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

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FN-REGIS.dot 1/2/08



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
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February 27, 2008

Mike Berry
Automated Machine Products
11265 Solomon Road
Troy, Indiana 47588

Re: Registered Construction and Operation Status,
R123-25999-00027

Dear Mr. Berry:

The application from Automated Machine Products received on January 28, 2008, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1, it has been determined that the following a stationary metal coating source located at 11265 Solomon Road, Troy, Indiana 47588, is classified as registered:

One (1) spray booth, equipped with three (3) high volume low pressure (HVL) spray guns, identified as P01, approved for construction in 2008 with a maximum capacity of coating 100 metal brake drums per hour, using fabric filters for particulate controlled, and exhausting to stack 01.

The following conditions shall be applicable:

- (a) Pursuant to 326 IAC 6-3-2(d), the following requirements apply to the spray booth:
 - (1) Particulate emissions from the spray booth shall be controlled by dry filters and the source shall operate the control device in accordance with manufacturer's specifications.
 - (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (i) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (ii) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (3) If overspray is visibly detected, the owner or operator shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

- (b) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (c) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (d) The VOC usage for the spray booth shall be less than 15.0 pounds per day to render the requirements of 326 IAC 8-2-9 not applicable.
- (1) To document compliance with this limit, the owner or operator of this source shall maintain records for the total VOC usage for the spray booth each day. These records shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC emission limit for the spray booth:
 - (i) The amount and VOC content of each coating material, dilution solvent, and cleanup solvent used for each day. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount of materials used.
 - (ii) The total VOC usage for each day.
 - (2) Records of all required monitoring data, reports and support information required by this exemption 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 makes a request for records to the owner or operator of this source, the owner or operator of this source shall furnish the records to the Commissioner within a reasonable time.

This registration is the first approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue**

**MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251**

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

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

If you have any questions on this matter, please contact Renee Traivaranon, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-234-5615 or at 1-800-451-6027 (ext 4-5615).

Sincerely,

Original signed by
Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

IC/rt
Attachments

cc: File - Perry County
Perry County Health Department
Air Compliance Section
IDEM Southwest Regional Office
Compliance Data Section
Permits Administrative and Development
Billing, Licensing and Training Section

Registration Annual Notification

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

Company Name:	Automated Machine Products
Address:	11265 Solomon Road
Phone #:	(715) 256-9575
Registration #:	R 123-25999-00027

Certification by the Authorized Individual

I hereby certify that **Automated Machine Products** is still in operation and is in compliance with the requirements of Registration **R123-25999-00027**.

Name (typed):

Title:

Signature:

Phone Number:

Date:

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

Technical Support Document (TSD) for a Registration

Source Description and Location

Source Name: Automated Machine Products
Source Location: 11265 Solomon Road, Troy, Indiana 47588
County: Perry
SIC Code: 3479
Registration (or Exemption) No.: 123-25999-00027
Permit Reviewer: Renee Traivaranon

On January 28, 2008, the Office of Air Quality (OAQ) has received an application from Automated Machine Products related to construction and operation of a new metal coating plant.

Existing Approvals

This is the first air approval issued to this source.

County Attainment Status

The source is located in Perry County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

(a) Ozone Standards

- (1) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Perry County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (2) Perry County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.

(b) Other Criteria Pollutants

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

Fugitive Emissions

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

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Automated Machine Products, on January 28, 2008, relating to a new emission unit constructed at a new registration source.

The following is a list of the new emission unit and pollution control device:

One (1) spray booth, equipped with three (3) high volume low pressure (HVLP) spray guns, identified as P01, approved for construction in 2008 with a maximum capacity of coating 100 metal brake drums per hour, using fabric filters for particulate controlled, and exhausting to stack 01.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination Registration

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

Process/Emission Unit	Potential To Emit of the Entire Source (tons/year)							
	PM	PM10 *	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Spray Booth	10.46	10.46	--	--	2.61	--	2.61	2.61 (Ethylene Glycol)
Total PTE of Entire Source	10.46	10.46	--	--	2.61	--	2.61	2.61 (Ethylene Glycol)

-- = negligible
 * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of PM and PM10 are within the ranges listed in 326 IAC 2-5.1-2(a)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.1-2(a)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registrations). A Registration will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of 40 CFR 63, Subpart M (National Emission Standards for Hazardous Air Pollutants (NESHAP)-Miscellaneous Metal Parts and Products) are not included for this source because the source is not a major source for Hazardous Air Pollutants (HAPs); the potential to emit of single HAP is less than 10 tons per year and the potential to emit of combined HAPs is less than 25 tons per year.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-5.1-2 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

- (d) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not locate in nonattainment areas for particulate matter potential which has potential fugitive particulate matter emissions of twenty-five (25) tons per year or more.
- (g) 326 IAC 7-1.1-1 (Sulfur dioxide emission limitations: applicability)
The source is not subject to the requirements of 326 IAC 7-1.1, because the potential to emit of each emission unit is less than twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide.
- (h) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.
- (i) 326 IAC 10-1 (Nitrogen Oxides Control)
The source is not subject to 326 IAC 10 (Nitrogen Oxides Control) because the source is not located in Clark or Floyd Counties.

Metal Coating Operation

- (a) Pursuant to 326 IAC 6-3-2(d), the following requirements apply to the spray booth:
- (1) Particulate emissions from the spray booth shall be controlled by dry filters and the source shall operate the control device in accordance with manufacturer's specifications.
 - (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (i) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (ii) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

- (3) If overspray is visibly detected, the owner or operator shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

(b) 326 IAC 8-2-9 (Miscellaneous metal coating operations)

Pursuant to 326 IAC 8-2-1, the provisions of 326 IAC 8-2-9 apply to miscellaneous metal coating operations, constructed after July 1, 1990 located in any country and have actual emissions of greater than fifteen (15) pounds of VOC per day before add-on controls. The potential to emit VOC from the spray booth is less than fifteen (15) pounds per day. (equivalent to 2.7 tons per years.) Therefore, the requirements of 326 IAC 8-2-9 are not applicable.

The owner or operator of this source shall maintain records, which shall be complete and sufficient to establish compliance with the VOC emission requirements for the spray booth. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount of materials used.

Records of all required monitoring data, reports and support information required by this exemption 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 makes a request for records to the owner or operator of this source, the owner or operator of this source shall furnish the records to the Commissioner within a reasonable time.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on January 28, 2008.

The construction and operation of this source shall be subject to the conditions of the attached proposed Registration No. 123-25999-00027. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Ms. Renee Traivaranon at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5615 or toll free at 1-800-451-6027 extension 4-5615.
- (b) A copy of the findings is available on the Internet at: www.in.gov/idem/permits/air/pending.html.
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.in.gov/idem/permits/guide/.

**Appendix A: Emissions Calculations
VOC/HAP and Particulate
From Surface Coating Operation**

**Company Name: Automated Machine Products
Address City IN Zip: 11265 Solomon Road, Troy, Indiana 47588
Permit Number: 123-25999-00027
Reviewer: Renee Traivaranon
Date: February 14, 2008**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds/hour	Potential VOC pounds/day	Potential VOC tons/year	Particulate Potential (ton/yr)	lb VOC/gal solids	Weight % Ethylene Glycol	Ethylene Glycol Emissions (ton/yr)	Transfer efficiency	
Black Primer	11.9	42.87%	37.9%	5.0%	54.2%	37.80%	0.01	100	1.30	0.60	0.60	14.33	2.61	10.46	1.58	5.0%	2.61	65.0%	

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
 Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
 HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs