



DATE: October 13, 2008

TO: Interested Parties / Applicant

RE: Major Tool and Machine, Inc. / F097-26430-00275

FROM: Richard Wise *Rg*
Administrator
Office of Environmental Services

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 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 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 of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 501, Indianapolis, IN 46204, **within fifteen (15) calendar 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.

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

Enclosures

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Department of Public Works
Office of Environmental Services

2700 Belmont Avenue | 317-327-2234
Indianapolis, IN 46221 | Fax 327-2274
TDD 327-5186
indygov.org/dpw

CERTIFIED MAIL No.: 7007 0710 0005 3965 5117



October 13, 2008

Mr. Chris Rothenberger
Major Tool and Machine, Inc.
1458 E. 19th Street
Indianapolis, IN 46218

Re: SPR097-26430-00275
Significant Permit Revision to
FESOP No.: F097-14822-00275

Dear Mr. Rothenberger:

Major Tool and Machine, Inc. was issued FESOP Renewal No. F097-14822-00275 on March 29, 2004 for a stationary steel fabricating, machining and welding source. A First Administrative Amendment (AA) 097-19119-00275 was issued by the City of Indianapolis OES on September 8, 2004. A Second Administrative Amendment (AA) 097-25893-00275 was issued on January 17, 2008.

An application was received from Major Tool and Machine, Inc. on April 17, 2008, relating to the addition of a new coating booth, a new shot blasting machine, new welding operations, new natural gas heaters for building space heat and increased usage of isopropyl alcohol for parts cleaning. Pursuant to the provisions of 326 IAC 2-8-11.1(g)(2), a significant permit revision is hereby approved as described in the attached Technical Support Document (TSD).

Other than changes detailed in the TSD for this approval, 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 Jeffrey Hege, at (317) 327-2234 or jhege@indygov.org.

Sincerely,

A handwritten signature in black ink that reads "Richard Wise".

Richard Wise, Administrator
Office of Env. Services, DPW

Attachments: Revised Permit and Technical Support Document
Notice of Decision

TJM / jsh

cc: File
Air Compliance, Matt Mosier
IDEM, Mindy Hahn
Permits, Jeffrey Hege
USEPA, Region 5
Marion County Health Department

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Department of Public Works
Office of Environmental Services

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Indianapolis, IN 46221
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TDD 327-5186
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**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) RENEWAL
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

and

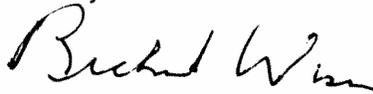
**CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES**

**Major Tool & Machine, Inc.
1458 East 19th Street
Indianapolis, Indiana 46218**

(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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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 the conditions of this permit. 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.

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 2-8 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.

Operation Permit No.: F097-14822-00275	
Original signed by, John B. Chavez, Administrator Office of Environmental Services	Issuance Date: March 29, 2004 Expiration Date: March 29, 2014
First Administrative Amendment: F097-19119-00275, issued on September 8, 2004 Second Administrative Amendment F097-25893-00275, issued on January 17, 2008	
Significant Permit Revision: F097-26430-00275	Conditions Affected: Entire permit
Issued by:  Richard Wise, Administrator Office of Environmental Services, DPW	Issuance Date: October 13, 2008 Expiration Date: March 29, 2014

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Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

317-327-2234
Fax 327-2274
TDD 327-5186
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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) the City of Indianapolis, Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 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 2-8-3(b)]

The Permittee owns and operates a stationary industrial and commercial machinery manufacturing plant and produces industrial and commercial machinery.

Source Address:	1458 East 19 th Street, Indianapolis, Indiana, 46218
Mailing Address:	1458 East 19 th Street, Indianapolis, Indiana, 46218
General Source Phone:	(317) 636-6433
SIC Code:	3599
County Location:	Marion
Source Location Status:	Nonattainment for PM-2.5 Attainment for all other criteria pollutants.
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Nonattainment NSR Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) One (1) paint spray booth, identified as PB-1, installed in June 1992, equipped with two (2) air atomization paint spray guns (with only one (1) paint spray gun can be used at any one time), air filters for overspray control, one (1) natural gas fired make up heater rated at 3.88 MMBtu/hr, and one (1) natural gas fired drying oven rated at 2.5 MMBtu/hr. The spray booth has a maximum coating rate of 0.5 units per hour with rated material usage of 3 gallons per unit and exhausts through two (2) exhaust stacks, identified as 001 and 002 with a total exhaust rate of 40,000 acfm.
- (b) One (1) coating booth, identified as EU PB-2, approved for construction in 2008, with a maximum capacity of 24 parts coated per day and 2 gallons of coating per part for a maximum capacity of forty-eight (48) gallons of coating per day, with electrostatic spraying as the application method, using dry filters as particulate control, and exhausting through one stack, identified as S-PB-2, with a total exhaust rate of 1,680 acfm.
- (c) One (1) single chamber blast machine, identified as SB-1, installed in August 1992, utilizing Aluminum Oxide as the blasting media, using one (1) single nozzle at 3/8th inch diameter and nozzle pressure of 100 psig. The blast machine uses one (1) baghouse with one (1) Vari-Pak cartridge filter for particulate matter control. The exhaust gas from the blast machine is vented back into building at a rate of 23,000 acfm.
- (d) One (1) shot blasting machine for surface preparation of parts before they are coated, identified as EU SB-2, approved for construction in 2008, with a maximum capacity of 24 parts blasted per day, consisting of a mechanical wheel that throws the shot at the parts within the machine, using a baghouse for control, and exhausting indoors.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Spray can touch up painting of production items.

- (b) Plant #1 (West) natural gas fired combustion furnaces and heaters at a total heat input of 2.91 MMBtu/hr. [326 IAC 6.5]
- (c) Plant #2 (East) natural gas fired combustion furnaces and heaters at a total heat input of 4.62 MMBtu/hr. [326 IAC 6.5]
- (d) Seventeen (17) natural gas fired space heaters at a total heat input of 8.9 MMBtu/hr. [326 IAC 6.5]
- (e) One (1) natural gas heat treating furnace rated at 0.33 MMBtu/hr. [326 IAC 6.5]
- (f) Equipment powered by internal combustion engines of capacity less than 0.5 MMBtu/hr. [326 IAC 6.5]
- (g) Replacement filters for air handling units.
- (h) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
- (i) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (j) Brazing equipment, cutting torches, soldering equipment and welding equipment not resulting in HAP's emissions.
- (k) Application of oils, greases, lubricants and other nonvolatiles applied as temporary protective coatings.
- (l) Cleaners and solvent(s) usage not exceeding 145 gallons per 12 months.
- (m) Closed loop heating and cooling systems.
- (n) Structural steel and bridge fabrication activities of less than 80 tons/yr welding consumables and cutting less than 200,00 linear feet of one (1) inch plate or equivalent.
- (o) Quenching operations used with heat treating processes.
- (p) Process vessel degassing and cleaning to prepare for internal repairs.
- (q) Paved and unpaved roads and parking lots with public access.
- (r) Gasoline generators not exceeding 110 Horsepower. [326 IAC 6.5]
- (s) A natural gas fired paint-curing oven rated at 2.5 MMBtu/hr. [326 IAC 6.5]
- (t) Plant #3 - two (2) natural gas fired boilers, each with a maximum heat input rate of 2.05 MMBTU/hr. [326 IAC 6.5]
- (u) Plant #3 - one (1) natural gas fired Thermocycler heating unit rated at 0.4 MMBtu/hr used for comfort heating. [326 IAC 6.5]
- (v) Emissions resulting from *metal inspection operations considered to be an activity with emissions equal to or less than the threshold equaling 3 pounds per hour or 15 pounds per day for Volatile Organic Compounds (VOC).*
- (w) Emissions resulting from the self-contained paint gun and line cleaning unit considered to be an activity with emissions equal to or less than the threshold equaling 3 pounds per hour or 15 pounds per day for VOC.

- (x) Emissions resulting from the application of protective metal coatings considered to be an activity with emissions equal to or less than the threshold equaling 3 pounds per hour or 15 pounds per day for VOC.
- (y) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (z) Heat exchanger cleaning and repair.
- (aa) Purging gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (bb) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (cc) Blowout for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (dd) Hand-wipe cleaning, identified as EU HWC, utilizing an isopropyl alcohol solution for cleaning of metal parts, with a maximum capacity of 600 gallons per twelve (12) consecutive month period.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the OES to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

This permit, F097-14822-00275, is issued for a fixed term of ten (10) 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.

B.4 Enforceability [326 IAC 2-8-6]

- (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, the OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) 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 the OES.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, and OES copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, and 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.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ, and the OES may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (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 an authorized individual 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) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (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. All 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

City of Indianapolis
Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (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 the 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 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and the OES may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement 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

City of Indianapolis
Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 the OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and the OES. IDEM, OAQ, and the OES, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (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, except as provided in 326 IAC 2-8-12.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes 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 the 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 No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-0178 (ask for Compliance Section)
Facsimile No.: 317-233-6865

City of Indianapolis OES
Telephone No.: 317-327-2234
Facsimile No.: 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

City of Indianapolis
Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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 2-8-4(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 the OES, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ and the 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 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- (h) Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), 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

City of Indianapolis
Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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 need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 the 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 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ or the 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 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or the OES, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or the OES, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)].

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and the OES and shall include the information specified in 326 IAC 2-8-3. 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

City of Indianapolis
Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (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 the OES on or before the date it is due.
- (2) If IDEM, OAQ and the 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 until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
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 2-8 until IDEM, OAQ and the 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 the OES, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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

City of Indianapolis
Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 approval required by 326 IAC 2-8-11.1 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

City of Indianapolis
Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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 2-8-

15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and the OES, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ, the OES or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC 13-17-3-2]

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, OES, and U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

-
- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 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

City of Indianapolis
Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and/or 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 the applicable fee is due April 1 of each year.
- (b) 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 317-233-4320 (ask for OAQ, Billing, Licensing and Training (BLT)), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
- (c) The potential to emit particulate matter less than 2.5 microns (PM-2.5) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review (NSR)) not applicable.
- (d) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (e) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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(3)]

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

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, 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 units 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.

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

City of Indianapolis
Office of Environmental Services
Enforcement Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-8-4(3)]

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

- (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

City of Indianapolis
Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ and the 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and the OES, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and the OES, if the source submits to IDEM, OAQ, and the 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]

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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed 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.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in 40 CFR 68 is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the

likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

- (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

-
- (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 reserves 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

-
- (a) Records of all required monitoring data, reports and support information required by this permit 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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or the OES 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.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source 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 "authorized individual" as defined by 326 IAC2-1.1-1(1).

- (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

City of Indianapolis
Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (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, and the OES 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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 2-8-4(10)]:

- (a) One (1) paint spray booth, identified as PB-1, installed in June 1992, equipped with two (2) air atomization paint spray guns (with only one (1) paint spray gun can be used at any one time), air filters for overspray control, one(1) natural gas fired make up heater rated at 3.88 MMBtu/hr, and one (1) natural gas fired drying oven rated at 2.5 MMBtu/hr. The spray booth has a maximum coating rate of 0.5 units per hour with rated material usage of 3 gallons per unit and exhausts through two (2) exhaust stacks, identified as 001 and 002 with a total exhaust rate of 40,000 acfm.
- (b) One (1) coating booth, identified as EU PB-2, approved for construction in 2008, with a maximum capacity of 24 parts coated per day and 2 gallons of coating per part for a maximum capacity of forty-eight (48) gallons of coating per day, with electrostatic spraying as the application method, using dry filters as particulate control, and exhausting through one stack, identified as S-PB-2, with a total exhaust rate of 1,680 acfm.

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

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compound [326 IAC 8-2-9] [326 IAC 2-8-4]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied at PB-1 and PB-2, as a daily volume weighted average, to miscellaneous metal parts, including maintenance spray painting of production equipment, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried or forced warm air dried at temperatures up to ninety (90) Celsius (one hundred and ninety four (194) degrees Fahrenheit) for the coating application system.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such manner that evaporation is minimized.
- (b) Pursuant to 326 IAC 2-8-4, VOC emissions from clean-up solvent usage on the coating applicator for paint booth PB-2 shall be limited to 23.5 tons per twelve (12) month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit of VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.2 Hazardous Air Pollutants [326 IAC 2-8]

The hazardous air pollutant emissions shall be limited as follows:

- (a) The total usage of the worst case single hazardous air pollutant (HAP) at PB-1 and PB-2 shall not exceed nine (9) tons per twelve (12) months period, with compliance determined at the end of each month. This nine (9) tons per year limit when combined with the potential to emit of any single HAP from the other emitting units at this source limits the potential to emit of the entire source to less than ten (10) tons per twelve (12) consecutive month period of any single HAP.
- (b) The total usage of the combination of HAPs at PB-1 and PB-2 shall not exceed twenty-four (24) per twelve (12) months period, with compliance determined at the end of each month. This twenty-four (24) tons per twelve (12) consecutive month period limit when

combined with the potential to emit of any combined HAP from the other emitting units at this source limits the potential to emit of the entire source to less than 25 tons per 12 consecutive month period of total combined HAP. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.3 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate (PM) emissions from the paint spray booth PB-1 and coating booth PB-2 shall not exceed three hundredths (0.03) grains per dry standard cubic foot of exhaust air.

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU PB-1 and PB-2.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC and HAP content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, and the OES, reserve the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 Volatile Organic Compounds (VOC)[326 IAC 8-1-2]

Compliance with the VOC content limit in condition D.1.1(a) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (C \times U) / \sum U]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and
U is the usage rate of the coating in gallons per day.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and emission limits established in Condition D.1.1.
- (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent less water used on daily basis.
 - (a) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (b) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The total VOC usage for each day when coating metal parts with protective metal coatings; and

- (4) Daily volume weighted average VOC content per gallon of coating less water.
 - (5) The VOC content and usage of each clean-up solvent used in PB-2.
 - (6) The monthly VOC emissions from the clean-up solvent used in PB-2
- (b) To document compliance with Condition D.1.2, the permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.1.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
- (1) The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The total single and combined HAPs usage for each month;
 - (3) The weight of worst-case single HAP and combination HAPs emitted for each compliance period.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(b) and D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter period being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (c) One (1) single chamber blast machine, identified as SB-1, installed in August 1992, utilizing Aluminum Oxide as the blasting media, using one (1) single nozzle at 3/8th inch diameter and nozzle pressure of 100 psig. The blast machine uses one (1) baghouse with one (1) Vari-Pak cartridge filter for particulate matter control. The exhaust gas from the blast machine is vented back into building at a rate of 23,000 acfm.
- (d) One (1) shot blasting machine for surface preparation of parts before they are coated, identified as EU SB-2, approved for construction in 2008, with a maximum capacity of 24 parts blasted per day, consisting of a mechanical steel wheels that throws the shot at the parts within the machine, using a baghouse for control, and exhausting indoors.

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

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate (PM) emissions from the single chamber blast machine, identified as SB-1, and the shot blasting machine, identified as EU SB-2, shall not exceed three hundredths (0.03) grains per dry standard cubic foot of exhaust air.

D.2.2 Particulate Limits [326 IAC 2-8]

Pursuant to 326 IAC 2-8-4, PM-10 emissions from the shot blasting machine, identified as EU SB-2, shall be limited to 3.24 lb/hr.

Compliance with this limit, combined with the potential to emit of PM-10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM-10 to less than 100 tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.2.3 Particulate Limits [326 IAC 2-2] [326 IAC 2-1.1-5]

- (a) In order to render 326 IAC 2-2 not applicable, PM emissions from the shot blasting machine, identified as EU SB-2, shall be limited to 3.24 lb/hr.
- (b) In order to render 326 IAC 2-1.1-5 not applicable, PM-2.5 emissions from the shot blasting machine, identified as EU SB-2, shall be limited to 3.24 lb/hr.

Compliance with this limit, combined with the limited potential to emit of PM and PM-2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period, and shall limit the source-wide total potential to emit of PM-2.5 to less than 100 tons per 12 consecutive month period. Therefore the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) are not applicable.

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU SB-2 and its control device.

Compliance Determination Requirements

D.2.5 Particulate Control

In order to comply with D.2.1, D.2.2 and D.2.3, the baghouse for particulate matter (PM) control shall be in operation at all times that EU SB-2 is in operation.

Compliance Monitoring Requirements [326 IAC 2 8 4][326 IAC 2 8 5(a)(1)]

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with EU SB-2 at least once per day when EU SB-2 is in operation. For EU SB-2, the pressure drop across the baghouse shall be in the normal manufacturer range of 2 to 10 inches of water or a range established during the latest stack test. When for any one reading the pressure drop across the baghouse is outside the "normal" range of operation, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from the permit.

D.2.7 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirements [326 IAC 2 8 4(3)]

D.2.8 Record Keeping Requirement

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain daily records of the total static pressure drop across the baghouse used in conjunction with EU SB-2. The Permittee shall include in its daily records when a static pressure drop notation is not taken and the reason for the lack of static pressure drop notation (i.e. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (b) Plant #1 (West) natural gas fired combustion furnaces and heaters at a total heat input of 2.91 MMBtu/hr. [326 IAC 6.5]
- (c) Plant #2 (East) natural gas fired combustion furnaces and heaters at a total heat input of 4.62 MMBtu/hr. [326 IAC 6.5]
- (d) Seventeen (17) natural gas fired space heaters at a total heat input of 8.9 MMBtu/hr. [326 IAC 6.5]
- (e) One (1) natural gas heat treating furnace rated at 0.33 MMBtu/hr. [326 IAC 6.5]
- (f) Equipment powered by internal combustion engines of capacity less than 0.5 MMBtu/hr. [326 IAC 6.5]
- (r) Gasoline generators not exceeding 110 horsepower. [326 IAC 6.5]
- (s) A natural gas fired paint curing oven rated at 2.5 MMBtu/hr. [326 IAC 6.5]
- (t) Two (2) natural gas fired boilers, each with a maximum heat input rate of 2.05 MMBTU per hour. [326 IAC 6.5]
- (u) Plant #3 - one (1) natural gas fired Thermocycler heating unit rated at 0.4 MMBtu/hr used for comfort heating. [326 IAC 6.5]

(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 2-8-4(1)]

D.3.1 Particulate Matter (PM) Limitations [326 IAC 6.5-1-2(b)(3)]

Pursuant to 326 IAC 6.5-1-2(b)(3), the two natural gas fired boilers shall not discharge a particulate matter content greater than one-hundredths (0.01) grain per dry standard cubic foot (dscf) of exhaust air when firing natural gas.

D.3.2 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate (PM) emissions from the Plant #1 (West) natural gas fired combustion furnaces and heaters, the Plant #2 (East) natural gas fired combustion furnaces and heaters, the seventeen (17) natural gas fired space heaters, the natural gas heat treating furnace, the equipment powered by internal combustion engines, the gasoline generators, the natural gas fired paint curing oven, and the natural gas fired Thermocycler heating unit (Plant #3) shall not exceed three hundredths (0.03) grains per dry standard cubic foot of exhaust air.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Major Tool & Machine, Incorporated
Source Address: 1458 East 19th Street, Indianapolis, Indiana 46218
Mailing Address: 1458 East 19th Street, Indianapolis, Indiana 46218
FESOP No.: F097-14822-00275

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:

Date:

**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**

**CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
DATA COMPLIANCE
2700 South Belmont Avenue
Indianapolis, Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Major Tool & Machine, Incorporated
Source Address: 1458 East 19th Street, Indianapolis, Indiana 46218
Mailing Address: 1458 East 19th Street, Indianapolis, Indiana 46218
FESOP No.: F097-14822-00275

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
|| The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
|| 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 Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , 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
 CITY OF INDIANAPOLIS
 OFFICE OF ENVIRONMENTAL SERVICES
 DATA COMPLIANCE**

FESOP Quarterly Report

Source Name: Major Tool & Machine, Incorporated
 Source Address: 1458 East 19th Street, Indianapolis, Indiana 46218
 Mailing Address: 1458 East 19th Street, Indianapolis, Indiana 46218
 FESOP No.: F097-14822-00275
 Facility: PB-1, PB-2 and the insignificant activities
 Parameter: Single HAP and Total HAPs

- Limit:
- (a) The total usage of the worst case single hazardous air pollutant (HAP) at PB-1 and PB-2 shall not exceed nine (9) tons per twelve (12) months period, with compliance determined at the end of each month. This nine (9) tons per year limit when combined with the potential to emit of any single HAP from the other emitting units at this source limits the potential to emit of the entire source to less than ten (10) tons per twelve (12) consecutive month period of any single HAP.
 - (b) The total usage of the combination of HAPs at PB-1 and PB-2 shall not exceed twenty-four (24) per twelve (12) months period, with compliance determined at the end of each month. This twenty-four (24) tons per twelve (12) consecutive month period limit when combined with the potential to emit of any single HAP from the other emitting units at this source limits the potential to emit of the entire source to less than 25 tons per 12 consecutive month period of total combined HAP.

QUARTER: _____ YEAR: _____

Month	This month		Previous 11 months		12 Month Total	
	Single HAP	Total HAP	Single HAP	Total HAP	Single HAP	Total HAP
Month 1						
Month 2						
Month 3						

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
DATA COMPLIANCE**

FESOP Quarterly Report

Source Name: Major Tool & Machine, Incorporated
Source Address: 1458 East 19th Street, Indianapolis, Indiana 46218
Mailing Address: 1458 East 19th Street, Indianapolis, Indiana 46218
FESOP No.: F097-14822-00275
Facility: PB-2
Parameter: VOCs
Limit: VOC emissions from clean-up solvent usage on the coating applicator for paint booth PB-2 shall be limited to 23.5 tons per twelve (12) month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	This month	Previous 11 months	12 Month Total
	VOC from clean-up solvent usage	VOC from clean-up solvent usage	VOC from clean-up solvent usage
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
DATA COMPLIANCE**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Major Tool & Machine, Incorporated
Source Address: 1458 East 19th Street, Indianapolis, Indiana 46218
Mailing Address: 1458 East 19th Street, Indianapolis, Indiana 46218
FESOP No.: F097-14822-00275

Months: _____ to _____ Year: _____

<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. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do 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	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

**Addendum to the Technical Support Document for a
Significant Permit Revision to a
Federally Enforceable State Operating Permit (FESOP)**

Source Name:	Major Tool and Machine, Inc.
Source Location:	1458 E. 19th Street, Indianapolis, Indiana, 46218
County:	Marion
SIC Code:	3599
Significant Permit Revision No.:	F097-26430-00275
Permit Reviewer:	Jeffrey Hege

On 9/10/08, the Office of Air Quality (OAQ) and the Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Major Tool and Machine, Inc. had applied for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP) to construct a new coating booth, a new shot blasting machine, new welding operations, new natural gas heaters for building space heat and increased usage of isopropyl alcohol for parts cleaning. The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On 9/23/08, Major Tool and Machine, Inc. submitted comments on the draft Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP). Upon further review, the OAQ and OES have decided to make the following revisions to the Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP). The TSD will remain as it originally appeared when published. Changes to the permit or technical support material that occur after the permit has published for public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision. Bolded language has been added and the language with ~~strikeout~~ has been deleted. The Table of Contents has been modified to reflect these changes.

The comments and responses, including changes to the permit, are as follows:

Major Tool and Machine Comment 1:

Major Tool and Machine stated that "the new coating booth, EU PB-2, exhausts through a stack outdoors and not indoors. Information on this stack was submitted with the application".

OES / OAQ Response 1:

The application submitted by Major Tool and Machine stated that the new coating booth, EU PB-2, is controlled by filters and vented through a stack, S-PB-2, to the ambient air. The comment made by Major Tool states that this stack will vent outside the building. Section A.2 and D.1 of the permit will be changed accordingly, as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

...

- (b) One (1) coating booth, identified as EU PB-2, approved for construction in 2008, with a maximum capacity of 24 parts coated per day and 2 gallons of coating per part for a maximum capacity of forty-eight (48) gallons of coating per day, with electrostatic spraying as the application method, using dry filters as particulate control, and exhausting ~~indoors~~ **through one stack, identified as S-PB-2, with a total exhaust rate of 1,680 acfm.**

....

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) paint spray booth, identified as PB-1, installed in June 1992, equipped with two (2) air atomization paint spray guns (with only one (1) paint spray gun can be used at any one time), air filters for overspray control, one(1) natural gas fired make up heater rated at 3.88 MMBtu/hr, and one (1) natural gas fired drying oven rated at 2.5 MMBtu/hr. The spray booth has a maximum coating rate of 0.5 units per hour with rated material usage of 3 gallons per unit and exhausts through two (2) exhaust stacks, identified as 001 and 002 with a total exhaust rate of 40,000 acfm.
- (b) One (1) coating booth, identified as EU PB-2, approved for construction in 2008, with a maximum capacity of 24 parts coated per day and 2 gallons of coating per part for a maximum capacity of forty-eight (48) gallons of coating per day, with electrostatic spraying as the application method, using dry filters as particulate control, and exhausting ~~indoors~~ **through one stack, identified as S-PB-2, with a total exhaust rate of 1,680 acfm.**

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

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

Technical Support Document (TSD) for a Significant Permit Revision to a
Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name: Major Tool and Machine, Inc.
Source Location: 1458 E. 19th Street, Indianapolis, Indiana, 46218
County: Marion
SIC Code: 3599
Operation Permit No.: F097-14822-00275
Operation Permit Issuance Date: March 29, 2004
Significant Permit Revision No.: SPR097-26430-00275
Permit Reviewer: Jeffrey Hege

On April 17, 2008, the Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) received an application from Major Tool and Machine, Inc. related to a modification to an existing steel fabricating, machining and welding source that manufactures predominantly gas turbine and power generator equipment.

Existing Approvals

The source was issued FESOP Renewal No. F097-14822-00275 on March 29, 2004. The source has since received the following approvals:

- (a) First Administrative Amendment No. 097-19119-00275, issued on September 8, 2004; and
- (b) Second Administrative Amendment No. 097-25893-00275, issued on January, 17, 2008.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective November 8, 2007, for the 8-hour ozone standard. ¹
PM-10	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.
¹ Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic Nonattainment effective April 5, 2005 for PM-2.5.	

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

- (2) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
 - (3) Volatile organic compounds (VOC) and Nitrogen Oxides (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. Marion 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.
- (b) **PM-2.5**
 Marion County has been classified as nonattainment for PM-2.5 in 70 FR 943 dated January 5, 2005. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM-2.5 emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM-2.5 and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
 Marion County has been classified as attainment or unclassifiable in Indiana for SO₂, CO, PM-10, NO₂ and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Status of the Existing Source

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

Process/Emission Unit	Potential To Emit of the Entire Source (tons/year)							Total HAPs	Worst Single HAP
	PM	PM-10	SO ₂	NOx	VOC	CO			
Surface Coating Booth (EU PB-1)	39.22	39.22	0	0	40.34	0.00	< 25	< 10	
Shot Blasting (EU SB-1)	31.54	22.08	0	0	0	0			
Insignificant Activities									
Natural Gas Combustion	0.10	0.20	0	3.20	0.20	2.70			
Touch-up paint	0	0	0	0	0.05	0			
Metal inspection	0	0	0	0	0.053	0			
Spray gun cleaning (EU PB-1)	0	0	0	0	0.737	0			
Protection metal coating	0	0	0	0	0.332	0			
Misc. coating	0	0	0	0	0.159	0			
Total PTE of Entire Source	70.86	70.96	0	3.20	41.87	2.70	< 25	< 10	

These emissions are based upon FESOP Renewal No. F097-14822-00275 TSD Appendix A

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major source of HAP, as defined in 40 CFR 63.41, because the Permittee has accepted limits on HAP emissions to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) and Office of Environmental Services (OES) has reviewed an application, submitted by Major Tool and Machine, Inc. on April 17, 2008, relating to the addition of a new coating booth, a new shot blasting machine, new welding operations, new natural gas heaters for building space heat and increased usage of isopropyl alcohol for parts cleaning.

- (a) The new coating booth will be constructed as an addition to the existing structure. In this booth, they will apply a "Universal InviraPrime" coating with Ransburg #2 Process guns utilizing an electrostatic spraying method. "Ultra Media" dry filters will be used to control overspray and particulate emissions from the coating operations. After being coated, the parts go through an electric IR cure oven. For purposes of this application, it is assumed all emissions occur in the booth itself before the coated parts reach the oven.
- (b) The source will utilize a shot blasting unit for surface preparation of the parts before they are coated in the booth. This unit consists of a mechanical wheel that "throws" the shot at the parts. Particulate emissions from this process will be controlled by a baghouse utilizing Ultra media filters.
- (c) The source is constructing an addition to their existing structure which will, in part, house two different types of welding operations: flux cored and MIG welding. There will be a total of three stations performing flux cored welding and two stations performing MIG welding.
- (d) The source will be using IPA alcohol wipes to wipe down the parts after blasting and before coating. They anticipate using a maximum of one container of IPA wipes per part, for a maximum of 24 containers/day.

In the source's existing FESOP, the maximum throughput of isopropyl alcohol cleaning solution is 220 gallons/yr. With this addition to their facility, they anticipate increasing the usage of this cleaning solvent to 600 gallons/yr.

The following is a list of the new and modified emission unit(s) and pollution control device(s):

- (a) One (1) coating booth, identified as EU PB-2, approved for construction in 2008, with a maximum capacity of 24 parts coated per day and 2 gallons of coating per part for a maximum capacity of forty-eight (48) gallons of coating per day, with electrostatic spraying as the application method, using dry filters as particulate control, and exhausting indoors.
- (b) One (1) shot blasting machine for surface preparation of parts before they are coated, identified as EU SB-2, approved for construction in 2008, with a maximum capacity of 24 parts blasted per day, consisting of a mechanical wheel that throws the shot at the parts within the machine, using a baghouse for control, and exhausting indoors.
- (c) Parts Cleaning utilizing Isopropyl alcohol wipes, identified as EU IPA-W, approved for construction in 2008, with a maximum capacity of twenty four (24) parts wiped per day and exhausting indoors.
- (d) Welding operations, consisting of three flux cored welding stations and two MIG welding stations, identified as EU WO, approved for construction in 2008, with a maximum capacity of 285.36 pounds of weld wire used per day, exhausting indoors.
- (e) 14 Natural Gas Combustion Units, identified as EU NGC, approved for construction in 2008, with a combined maximum heat input of capacity of 7.0 MMBTU/hr.
- (f) Hand-wipe cleaning, identified as EU HWC, utilizing an isopropyl alcohol solution for the cleaning of metal parts, with a maximum capacity of 600 gallons of cleaning solvent per year, exhausting indoors.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM-10	PM-2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Highest Single HAP
Coating Booth (EU PB-2)	0.93	0.93	0.93	0	0	30.66	0	12.70	11.59 (xylene)
Clean-up solvent usage (EU PB-2)	0	0	0	0	0	23.5 ¹	0	0	0
Shot Blasting (EU SB-2)	294	29.4	29.4	0	0	0	0	0	0
Insignificant Activities									
IPA Wipes	0	0	0	0	0	2.51	0	0	0
Welding Operations	1.21	1.21	1.21	0	0	0	0	0.055	0.027 (chromium)
Natural Gas Space Heaters	0.06	0.23	0.23	0.02	3.07	0.17	2.58	0.58	0.055 (hexane)
Isopropyl Alcohol Cleaning	0	0	0	0	0	1.21	0	0	0
Total PTE of Proposed Revision	296.2	31.8	31.8	0.02	3.1	58.1	2.6	12.7	11.6 (xylene)

¹ Potential VOC emissions from clean-up solvent usage cannot be determined. Source requested to limit VOC emissions to 23.5 tpy, therefore 23.5 tpy is being used for PTE of clean-up solvent usage.

The new shot blasting unit (EU SB-2) has the potential to emit PM greater than 250 tons per year, but they have accepted a particulate limit such that the requirements of 326 IAC 2-2 do not apply. Since PTE of PM is greater than 100 tons per year, the applicable particulate standard is now 326 IAC 6.5 and not 326 IAC 6-3. Therefore, even though the new units being proposed are similar to the existing permitted units, this FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(g)(2) because the modification triggers new applicable requirements for the units at the source.

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)								
	PM	PM-10	PM-2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Highest Single HAP
Surface Coating Booth (EU PB-1)	39.22	39.22	39.22	0	0	40.34	0	< 25	< 10
Surface Coating Booth (EU PB-2)	0.93	0.93	0.93	0	0	30.66	0		
Clean-up solvent usage (EU PB-2)	0	0	0	0	0	23.5 ¹	0		
Shot Blasting (EU SB-1)	31.54	22.08	22.08	0	0	0	0		
Shot Blasting (EU SB-2)	14.19	14.19	14.19	0	0	0	0		
Insignificant Activities									
IPA Wipes (EU IPA-W)	0	0	0	0	0	2.51	0		
Welding Operations (EU WO)	1.21	1.21	1.21	0	0	0	0		
Natural Gas Combustion (EU NGC)	0.16	0.43	0.43	0.02	6.27	0.37	5.28		
Isopropyl Alcohol Cleaning (EU IPA)	0	0	0	0	0	1.21	0		
Touch-up paint	0	0	0	0	0	0.05	0		
Metal inspection	0	0	0	0	0	0.053	0		
Spray gun cleaning (EU PB-1)	0	0	0	0	0	0.737	0		
Protection metal coating	0	0	0	0	0	0.332	0		
Misc. coating	0	0	0	0	0	0.159	0		
Total PTE of Entire Source	< 250	< 100	< 100	0.02	6.3	< 100	5.3	< 25	< 10
Title V									
Major Source Thresholds	NA	100	-	100	100	100	100	25	10
PSD									
Major Source Thresholds	250	250	100	250	250	250	250	NA	NA

¹ Potential VOC emissions from clean-up solvent usage cannot be determined. Source requested to limit VOC emissions to 23.5 tpy, from clean-up solvent usage for PB-2, such that source-wide total PTE for VOC emissions will be less than 100 tpy, and 326 IAC 2-7 is not applicable.

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (1) PM-10 emissions from shot blasting, identified as EU SB-2, shall be limited to less than 3.24 lbs/hr. The source shall comply with this limit by operating a baghouse as PM-10 emissions control (see Appendix A, page 10 of 10).
- (2) The total usage of the worst case single HAP at PB-1 and PB-2 shall not exceed nine (9) tons per twelve (12) month period, with compliance determined at the end of each month.
- (3) The total usage of the combination of HAPs at PB-1 and PB-2 shall not exceed twenty-four (24) tons per twelve (12) month period, with compliance determined at the end of each month.
- (4) VOC emissions from clean-up solvent usage on the coating applicator for paint booth PB-2 shall be limited to 23.5 tons per twelve (12) month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the limited potential to emit PM-10, VOC and HAP from all other emission units at this source, shall limit the source-wide total potential to emit of PM-10 and VOC to less than 100 tons per 12 consecutive month period, single HAP to less than ten (10) tons per 12 consecutive month period and combination of HAPs to less than twenty-five (25) tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(b) PSD Minor Source

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

- (1) PM / PM-2.5 emissions from shot blasting, identified as EU SB-2, shall be limited to less than 3.24 lbs/hr. The source shall comply with this limit by operating a baghouse as PM / PM-2.5 emissions control (see Appendix A, page 10 of 10).

Compliance with these limits, combined with the limited potential to emit PM and PM-2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period and limit PM-2.5 to less than 100 tons per 12 consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH, are not included for this proposed revision, since none of the applicability requirements of the

rule apply to this source (they do not use methylene chloride to strip, none of the targeted HAPs are present in any of the coatings utilized at this source and they do not spray paint mobile equipment).

- (c) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to 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 proposed revision:

- (a) **326 IAC 2-1.1-5 (Non-attainment New Source Review)**
Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. PM-2.5 and SO₂ emissions from this source are less than one hundred (100) tons per twelve (12) consecutive month period. Therefore, this source is not subject to nonattainment new source review requirements for PM-2.5 emissions.
- (b) **326 IAC 2-8-4 (FESOP)**
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (c) **326 IAC 2-2 (Prevention of Significant Deterioration(PSD))**
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (d) **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**
The unlimited potential to emit of HAPs from the coating booths, identified as EU PB-1 and PB-2, is greater than ten (10) tons per year for any single HAP and greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from the coating booths, identified as EU PB-1 and PB-2, to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the proposed revision is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (e) **326 IAC 2-6 (Emission Reporting)**
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) **326 IAC 5-1 (Opacity Limitations)**
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (g) IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
With the addition of a new shot blasting unit, identified as EU-SB-2, the source wide potential to emit particulate matter is now greater than one hundred (100) tons per year (see TSD Appendix A page 1). Therefore, 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) is no longer an applicable requirement for particulate matter emissions from this source. Because the potential to emit particulate matter is now greater than one hundred (100) tons per year, 326 IAC 6.5 (Particulate Matter Limitations) is now the applicable requirement for particulate matter emissions from this source.
- (h) 326 IAC 6.5 (Particulate Matter Limitations)
This source has the potential to emit one hundred (100) tons or more of particulate matter per year. Pursuant to this rule, particulate matter emissions from the paint spray booth, identified as PB-1, the single chamber blast machine, identified as SB-1, the new coating booth, identified as EU PB-2, and the new shot blasting operation, identified as EU SB-2 shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf) of exhaust air. In order to comply with this rule, the source shall operate the control device at all times that the new coating booth, identified as EU PB-2, and the new shot blasting operation, identified as EU SB-2, are in operation.
- (i) 326 IAC 6.5-1-2(b)(3) (Particulate Matter Limitations Except Lake County)
This source has the potential to emit one hundred (100) tons or more of particulate matter per year. Pursuant to this rule, particulate matter emissions from the two (2) natural gas fired boilers shall not discharge a particulate matter content greater than one-hundredth (0.01) grain per dry standard cubic foot of exhaust air when firing natural gas.
- (j) 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.
- (k) 326 IAC 8-2-9 (Miscellaneous Metal Coating)
Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint spray booth (PB-1) and the new coating booth (PB-2) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried or forced warm air dried at temperatures up to ninety (90) Celsius (one hundred and ninety four (194) degrees Fahrenheit) for the coating application system.

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

The source shall use daily volume weighted average compliance determination to continue demonstrating compliance with the VOC content limits for Miscellaneous Metal Coating. This volume weighted average shall be determined by the following equation:

$$A = [\sum (C \times U) / \sum U]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and
U is the usage rate of the coating in gallons per day.

Proposed Changes

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

Change 1

The source submitted an application to add a new paint booth (EU PB-2) and a new sandblasting operation (EU SB-2). The new paint booth added PM, VOC and HAP emissions and the new sandblasting operation added PM emissions. Since potential emissions of PM are now greater than 100 tons/yr, the entire source is now subject to the particulate limit found in 326 IAC 6.5-1-2 (0.03 grains/dscf). In order to comply with 326 IAC 6.5-1-2(a), the source must operate a control device at all times that the new shot blasting operation, identified as EU SB-2, are in operation. The source will limit HAP emissions from the new paint booth such that the source-wide total emissions will be limited to less than 10 tons for the highest single HAP and less than 25 tons for a combination of HAPs. The source has requested that the clean-up solvent at the new paint booth be limited to 23.5 tons such that the source-wide total emissions of VOC will be limited to less than 100 tons. Therefore, the descriptions of the equipment, the particulate limits, VOC and HAP limits, compliance determination and monitoring requirements, and reporting forms have been updated as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

....

- (b) **One (1) coating booth, identified as EU PB-2, approved for construction in 2008, with a maximum capacity of 24 parts coated per day and 2 gallons of coating per part for a maximum capacity of forty-eight (48) gallons of coating per day, with electrostatic spraying as the application method, using dry filters as particulate control, and exhausting indoors.**
- (c) ~~(b)~~ One (1) single chamber blast machine, identified as SB-1, installed in August 1992, utilizing Aluminum Oxide as the blasting media, using one (1) single nozzle at 3/8th inch diameter and nozzle pressure of 100 psig. The blast machine uses one (1) baghouse with one (1) Vari-Pak cartridge filter for particulate matter control. The exhaust gas from the blast machine is vented back into building at a rate of 23,000 acfm.
- (d) **One (1) shot blasting machine for surface preparation of parts before they are coated, identified as EU SB-2, approved for construction in 2008, with a maximum capacity of 24 parts blasted per day, consisting of a mechanical wheel that throws the shot at the parts within the machine, using a baghouse for control, and exhausting indoors.**

...

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

....

- (b) **One (1) coating booth, identified as EU PB-2, approved for construction in 2008, with a maximum capacity of 24 parts coated per day and 2 gallons of coating per part for a maximum capacity of forty-eight (48) gallons of coating per day, with electrostatic spraying as the application method, using dry filters as particulate control, and exhausting indoors.**

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

...

D.1.1 Volatile Organic Compound [326 IAC 8-2-9] [326 IAC 2-8-4]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied at PB-1 **and PB-2**, as a daily volume weighted average, to miscellaneous metal parts, including maintenance spray painting of production

equipment, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried or forced warm air dried at temperatures up to ninety (90) Celsius (one hundred and ninety four (194) degrees Fahrenheit) for the coating application system.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such manner that evaporation is minimized.

- (b) **Pursuant to 326 IAC 2-8-4, VOC emissions from clean-up solvent usage on the coating applicator for paint booth PB-2 shall be limited to 23.5 tons per twelve (12) month period, with compliance determined at the end of each month.**

Compliance with these limits, combined with the potential to emit of VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.2 Hazardous Air Pollutants [326 IAC 2-8]

The hazardous air pollutant emissions shall be limited as follows:

- (a) The total usage of the worst case single hazardous air pollutant (HAP) at PB-1 **and PB-2** shall not exceed nine (9) tons per twelve (12) months period, with compliance determined at the end of each month. This nine (9) tons per year limit when combined with the potential to emit of any single HAP from the other emitting units at this source limits the potential to emit of the entire source to less than ten (10) tons per twelve (12) consecutive month period of any single HAP.
- (b) The total usage of the combination of HAPs at PB-1 **and PB-2** shall not exceed twenty-four (24) tons per twelve (12) months period, with compliance determined at the end of each month. This twenty-four (24) tons per twelve (12) consecutive month period limit when combined with the potential to emit of any combined HAP from the other emitting units at this source limits the potential to emit of the entire source to less than 25 tons per 12 consecutive month period of total combined HAP. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

~~Pursuant to F097-6238-00275, issued on June 4, 1997, and 40 CFR 52 Subpart P, the PM from the paint spray booth PB-1 shall not exceed the pound per hour emission rate established as E in the following formula:~~

~~Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

$$E = 4.10 P^{0.67} \text{ where } E = \text{rate of emission in pounds per hour; and } P = \text{process weight rate in tons per hour}$$

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

~~Pursuant to 326 IAC 6-3-2(d), particulate from PB-1 shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.~~

D.1.3 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate (PM) emissions from the paint spray booth PB-1 and coating booth PB-2 shall not exceed three hundredths (0.03) grains per dry standard cubic foot of exhaust air.

D.1.45 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU PB-1 and **PB-2** and their respective control devices.

Compliance Determination Requirements

D.1.56 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) [326 IAC 8-1-2]

...

D.1.67 Volatile Organic Compounds (VOC)[326 IAC 8-1-2]

....

~~Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]~~

~~D.1.8 Monitoring~~

-
- ~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response stop. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~
 - ~~(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response stop. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~
 - ~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

~~D.1.79 Record Keeping Requirements~~

-
- ~~(a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (46) below. Records maintained for (1) through (46) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and emission limits established in Condition D.1.1.
 - ~~(1) The VOC content of each coating material and solvent used less water.~~
 - ~~(2) The amount of coating material and solvent less water used on daily basis.
 - ~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
 - ~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.~~~~
 - ~~(3) The total VOC usage for each day when coating metal parts with protective metal coatings; and~~
 - ~~(4) Daily volume weighted average VOC content per gallon of coating less water.~~
 - ~~(5) The VOC content and usage of each clean-up solvent used in PB-2.~~
 - ~~(6) The monthly VOC emissions from the clean-up solvent used in PB-2~~~~

...

~~D.1.810~~ Reporting Requirements

A quarterly summary of the information to document compliance with Conditions **D.1.1(b)** and **D.1.2** shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter period being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

...

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

....

- (d) **One (1) shot blasting machine for surface preparation of parts before they are coated, identified as EU SB-2, approved for construction in 2008, with a maximum capacity of 24 parts blasted per day, consisting of a mechanical wheel that throws the shot at the parts within the machine, using a baghouse for control, and exhausting indoors.**

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

~~D.2.1~~ Particulate Matter (PM) [326 IAC 6-3-2]

~~Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the single chamber blast machine shall not exceed 2.1 pounds per hour when operating at a process weight rate of 0.4 tons per hour. The pounds per hour limitation was calculated using the following equation:
Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:~~

$$E = 4.10 P^{0.67} \text{ where } E = \text{rate of emission in pounds per hour; and } P = \text{process weight rate in tons per hour}$$

D.2.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate (PM) emissions from the single chamber blast machine, identified as SB-1, and the shot blasting machine, identified as EU SB-2, shall not exceed three hundredths (0.03) grains per dry standard cubic foot of exhaust air.

D.2.2 Particulate Limits [326 IAC 2-8]

Pursuant to 326 IAC 2-8-4, PM-10 emissions from the shot blasting machine, identified as EU SB-2, shall be limited to 3.24 lb/hr.

Compliance with this limit, combined with the limited potential to emit of PM-10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM-10 to less than 100 tons per 12 consecutive month period, and shall render 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.2.3 Particulate Limits [326 IAC 2-2]

- (a) **In order to render 326 IAC 2-2 not applicable, PM emissions from the shot blasting machine, identified as EU SB-2, shall be limited to 3.24 lb/hr.**
- (b) **In order to render 326 IAC 2-1.1-5 not applicable, PM-2.5 emissions from the shot blasting machine, identified as EU SB-2, shall be limited to 3.24 lb/hr.**

Compliance with this limit, combined with the limited potential to emit of PM and PM-2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period, and shall limit the source-wide total potential to emit of PM-2.5 to less than 100 tons per 12 consecutive month period. Therefore the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 (Nonattainment NSR) are not applicable.

D.2.42 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for **EU SB-2** ~~this facility~~ and its control device.

Compliance Determination Requirements

D.2.53 Particulate Control

~~In order to comply with condition D.2.1, the baghouse using cartridge filter for particulate control shall be in operation and control emissions from the single chamber blast machine (SB-1) at all times that the single chamber blast machine is in operation.~~ **In order to comply with D.2.1, D.2.2 and D.2.3, the baghouse for particulate matter (PM) control shall be in operation at all times that EU SB-2 is in operation.**

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with EU SB-2 at least once per day when EU SB-2 is in operation. For EU SB-2, the pressure drop across the baghouse should be in the normal manufacturer range of 2 to 10 inches of water or a range established during the latest stack test. When for any one reading the pressure drop across the baghouse is outside the "normal" range of operation, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from the permit.

D.2.7 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.2.8 Record Keeping Requirement

- (a) To document compliance with Condition D.2.6, the Permittee shall maintain daily records of the total static pressure drop across the baghouse used in conjunction with EU SB-2. The Permittee shall include in its daily records when a static pressure drop notation is not taken and the reason for the lack of static pressure drop notation (i.e. the process did not operate that day).**

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

...

D.3.1 ~~Particulate [326 IAC 6-2-4]~~Particulate Matter (PM) Limitations [326 IAC 6.5-1-2(b)(3)]
~~Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from each of the two (2) boilers, based on a total heat input rate of 4.1 MMBtu per hour, shall not exceed six tenths (0.6) pounds per MMBtu heat input. Pursuant to 326 IAC 6.5-1-2(b)(3), the two natural gas fired boilers shall not discharge a particulate matter content greater than one-hundredths (0.01) grain per dry standard cubic foot (dscf) of exhaust air when firing natural gas.~~

D.3.2 Particulate Matter Limitations Except Lake County [326 IAC 6.5-1-2(a)]
Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), particulate (PM) emissions from the Plant #1 (West) natural gas fired combustion furnaces and heaters, the Plant #2 (East) natural gas fired combustion furnaces and heaters, the seventeen (17) natural gas fired space heaters, the natural gas heat treating furnace, the equipment powered by internal combustion engines, the gasoline generators, the natural gas fired paint curing oven, and the natural gas fired Thermocycler heating unit (Plant #3) shall not exceed three hundredths (0.03) grains per dry standard cubic foot of exhaust air.

...

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
DATA COMPLIANCE

FESOP Quarterly Report

Source Name: Major Tool & Machine, Incorporated
Source Address: 1458 East 19th Street, Indianapolis, Indiana 46218
Mailing Address: 1458 East 19th Street, Indianapolis, Indiana 46218
FESOP No.: F097-14822-00275
Facility: PB-1, PB-2 and the insignificant activities
Parameter: Single HAP and Total HAPs

- Limit:
- (a) The total usage of the worst case single hazardous air pollutant (HAP) at PB-1 and PB-2 shall not exceed nine (9) tons per twelve (12) months period, with compliance determined at the end of each month. This nine (9) tons per year limit when combined with the potential to emit of any single HAP from the other emitting units at this source limits the potential to emit of the entire source to less than ten (10) tons per twelve (12) consecutive month period of any single HAP.
 - (b) The total usage of the combination of HAPs at PB-1 and PB-2 shall not exceed twenty-four (24) per twelve (12) months period, with compliance determined at the end of each month. This twenty-four (24) tons per twelve (12) consecutive month period limit when combined with the potential to emit of any single HAP from the other emitting units at this source limits the potential to emit of the entire source to less than 25 tons per 12 consecutive month period of total combined HAP.

QUARTER: _____ YEAR: _____

Month	This month		Previous 11 months		12 Month Total	
	Single HAP	Total HAP	Single HAP	Total HAP	Single HAP	Total HAP
Month 1						
Month 2						
Month 3						

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 CITY OF INDIANAPOLIS
 OFFICE OF ENVIRONMENTAL SERVICES
 DATA COMPLIANCE**

FESOP Quarterly Report

Source Name: Major Tool & Machine, Incorporated
Source Address: 1458 East 19th Street, Indianapolis, Indiana 46218
Mailing Address: 1458 East 19th Street, Indianapolis, Indiana 46218
FESOP No.: F097-14822-00275
Facility: PB-2
Parameter: VOCs
Limit: VOC emissions from clean-up solvent usage on the coating applicator for paint booth PB-2 shall be limited to 23.5 tons per twelve (12) month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	This month	Previous 11 months	12 Month Total
	VOC from clean-up solvent usage	VOC from clean-up solvent usage	VOC from clean-up solvent usage
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Change 2

The source submitted an application which updated the insignificant activities at the facility. Therefore, the descriptions of the various insignificant activities have been updated. The source is now subject to 326 IAC 6.5, so the descriptions of the appropriate insignificant activities were updated with this applicable requirement, as follows:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

....

- (b) Plant #1 (West) natural gas fired combustion furnaces and heaters at a total heat input of 2.91 MMBtu/hr. [326 IAC 6.5]
- (c) Plant #2 (East) natural gas fired combustion furnaces and heaters at a total heat input of 4.62 MMBtu/hr. [326 IAC 6.5]
- (d) **Seventeen (17) Three (3)** natural gas fired space heaters at a total heat input of **8.9 MMBtu/hr** ~~1.93 MMBtu per hour~~, [326 IAC 6.5]
- (e) One (1) natural gas heat treating furnace rated at 0.33 MMBtu/hr. [326 IAC 6.5]
- (f) Equipment powered by internal combustion engines of capacity less than 0.5 MMBtu/hr. [326 IAC 6.5]
-
- (r) Gasoline generators not exceeding 110 horsepower. [326 IAC 6.5]
- (s) A natural gas fired paint curing oven rated at 2.5 MMBtu/hr. [326 IAC 6.5]
- (t) Two (2) natural gas fired boilers, each with a maximum heat input rate of 2.05 MMBTU per hour. [326 IAC 6.5]
- (u) Plant #3 - one (1) natural gas fired Thermocycler heating unit rated at 0.4 MMBtu/hr used for comfort heating. [326 IAC 6.5]
- (dd) **Hand-wipe cleaning, identified as EU HWC, utilizing an isopropyl alcohol solution for cleaning of metal parts, with a maximum capacity of 600 gallons per twelve (12) consecutive month period.**

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (b) **Plant #1 (West) natural gas fired combustion furnaces and heaters at a total heat input of 2.91 MMBtu/hr. [326 IAC 6.5]**
- (c) **Plant #2 (East) natural gas fired combustion furnaces and heaters at a total heat input of 4.62 MMBtu/hr. [326 IAC 6.5]**
- (d) **Seventeen (17) natural gas fired space heaters at a total heat input of 8.9 MMBtu/hr. [326 IAC 6.5]**
- (e) **One (1) natural gas heat treating furnace rated at 0.33 MMBtu/hr. [326 IAC 6.5]**
- (f) **Equipment powered by internal combustion engines of capacity less than 0.5 MMBtu/hr. [326 IAC 6.5]**
- (r) **Gasoline generators not exceeding 110 horsepower. [326 IAC 6.5]**
- (s) **A natural gas fired paint curing oven rated at 2.5 MMBtu/hr. [326 IAC 6.5]**
- (t) **Two (2) natural gas fired boilers, each with a maximum heat input rate of 2.05 MMBTU per hour. [326 IAC 6.5]**
- (u) **Plant #3 - one (1) natural gas fired Thermocycler heating unit rated at 0.4 MMBtu/hr used for comfort heating. [326 IAC 6.5]**

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

Change 3

The source submitted an application which added equipment (shot blasting machine identified as EU SB-2) which increased source-wide potential to emit of PM to greater than 250 tons per year. The source wants to remain minor for PSD, so they must take a limit to keep PM emissions less than 250 tons per year. This limit required conditions C.1 and C.2 to be updated, along with the renumbering of all subsequent Section C conditions, as follows:

~~C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]~~

- ~~(1) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 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.~~
- ~~(2) Pursuant to 326 IAC 6-3-2(e)(2), 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.1 C-2 Overall Source Limit [326 IAC 2-8]~~

~~The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.~~

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) **The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.**
- (c) **The potential to emit particulate matter less than 2.5 microns (PM-2.5) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review (NSR)) not applicable.**
- (d)(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (e)(e) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

Change 4

IDEM and OES have reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan, in Condition C.14, with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C condition.

~~C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ ~~[326 IAC 2-8-4] [326 IAC 2-8-5]~~

- (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 the 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 is 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 time frame 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:~~

~~Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~

~~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, and it will be 10 days or more until the unit or device will be shut down, then 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 constitute a deviation of 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 an administrative amendment 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 Anormal@ 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 2-8-12 (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.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

- (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

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 April 17, 2008 and additional info was submitted on August 13, 2008.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. 097-26430-00275. The staff recommends to the Administrator that this FESOP Significant Revision be approved.

**Appendix A: Emissions Calculations
Emissions from Coating Booth (EU: PB-1)**

Company Name: Major Tool and Machine, Inc.
Address City IN Zip: 1458 East 19th Street, Indianapolis, Indiana, 46218
Permit Number: F097-26430-00275

Plt ID: 097-00275
Reviewer: Jeffrey Hege
Date: 6/2/2008

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 hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
AC 420 Wash Primer + Activator	7.0	90.92%	86.2%	4.7%	88.1%	5.11%	3.00000	0.500	3.01	0.33	11.76	2.15	2.49	6.39	40%
Armedock 400 Green F/S + Cure + Thinner	11.6	14.66%	0.0%	14.5%	0.0%	81.95%	3.00000	0.500	1.68	1.68	60.54	11.05	39.22	2.07	40%
White Gloss Topel + Catalyst/Gloss	10.4	33.37%	0.0%	33.7%	0.0%	49.11%	3.00000	0.500	3.50	3.50	126.16	23.02	27.14	7.14	40%
Thermaline 4700 Aluminum	8.7	52.00%	0.0%	52.0%	0.0%	51.00%	3.00000	0.500	5.04	5.04	181.58	33.14	18.35	16.27	40%
Tough Shield Polyurethane Gloss Enamel	9.8	31.89%	0.0%	31.7%	0.0%	81.4%	3.00000	0.500	3.11	4.67	112.04	20.45	26.46	6.05	40%
Aqua Borne Ceramic INT/EXT LO Sheen Primer	10.1	53.00%	47.9%	5.7%	0.0%	36.70%	3.00000	0.500	0.58	0.58	20.87	3.81	18.71	1.62	40%
Rust Seal Acrylic Gloss Enamel	10.6	57.00%	36.1%	18.9%	0.0%	32.00%	3.00000	0.500	2.00	2.00	72.01	13.14	17.97	6.25	40%
Isopropylal	6.6	100.00%	0.0%	100.0%	0.0%	0.0000%	0.00000	0.500	6.58	6.58	39.48	7.21	0.00		

State Potential Emissions
Worst case coating (coating usages are mutually exclusive) + Surface Preparation Solvent
Controlled emission (Based on 95% control of particulate emissions for dry filters)

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) * Maximum (units/hr) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (Density (lbs/gal) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs))
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * (1 - Weight % Volatiles) * (1 - Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs))
Total = Worst Coating + Sum of all solvents used
Potential VOC Emissions (ton/yr) = Maximum Usage (gal/yr) * VOC Content As Applied (lb/gal) / 2,000 lb/ton
Potential Xylene Emissions (ton/yr) = Maximum Usage (gal/yr) * Density (lb/gal) * Mixed Xylene Content (wt %) / 2,000 lb/ton
Potential MPM10 Emissions (ton/yr) = Maximum Usage (gal/yr) * Solids Content (lb/gal) * (1 - Transfer Efficiency) / 2,000 lb/ton
Controlled PMPM10 Emissions (ton/yr) = Potential PMPM10 Emissions (ton/yr) * (1 - Filter Control Efficiency)

Material	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethyl Benzene	Weight % Methyl Ethyl Ketone	Weight % Glycol Ethers	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Methyl Ethyl Ketone Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Combined HAPs (ton/yr)
AC 420 Wash Primer + Activator	6.95	3.000000	0.50	1.95%	0.00%	0.00%	0.00%	0.00%	0.89	0.00	0.00	0.00	0.00	0.89
Armedock 400 Green F/S + Cure + Thinner	11.62	3.000000	0.50	8.35%	0.03%	2.00%	0.00%	0.00%	6.37	0.02	1.53	0.00	0.00	7.92
White Gloss Topel + Catalyst/Gloss	10.4	3.000000	0.50	0.00%	0.00%	0.00%	10.51%	8.69%	0.00	0.00	0.00	7.18	5.94	13.12
Thermaline 4700 Aluminum	9.7	3.000000	0.50	35.00%	10.00%	10.00%	0.00%	0.00%	22.31	6.37	6.37	0.00	0.00	35.05
Tough Shield Polyurethane Gloss Enamel	9.8	3.000000	0.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Aqua Borne Ceramic INT/EXT LO Sheen Primer	10.1	3.000000	0.50	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Rust Seal Acrylic Gloss Enamel	10.6	3.000000	0.50	0.00%	0.00%	0.00%	0.00%	3.00%	0.00	0.00	0.00	0.00	2.09	2.09

Worst Case Coating (Coating Usages are mutually exclusive)

METHODOLOGY

HAPs emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * (8760 hrs/yr) * (1 ton/2000 lbs)

39.22

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221.06

9.21

221.06

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**Appendix A: Emissions Calculations
Emissions from Coating Booth (EU: PB-2)**

Company Name: Major Tool and Machine, Inc.
Address City IN Zip: 1458 East 19th Street, Indianapolis, Indiana, 46218
Permit Number: F097-26430-00275

Pit ID: 097-00275
Reviewer: Jeffrey Hege
Date: 6/3/2008

24	Maximum Number of Parts Coated Per Day
2	Maximum Gallon per Part
48	Maximum Gallons per Day

Product Name	Maximum Usage (gallons/yr)	Density (lb/gal)	VOC Content As Applied (lb/gal)	Mixed Xylenes Content (wt %)	Solids Content (lb/gal)	Potential VOC Emissions (ton/yr)	Potential Xylene Emissions (ton/yr)	Transfer Efficiency (%)	Potential PM/PM10 Emissions (tons/yr)	Filter Control Efficiency (%)	Controlled PM/PM10 Emissions (tons/yr)
Universal InviraPrime	17,520	12.02	3.50	11.01	8.45	30.66	11.59	75%	18.51	95%	0.93

Notes

MSDS shows 0-5% xylene content. Manufacturer was contacted and xylene content is 2.19%. Transfer efficiency (%) and control efficiency (%) values were provided by the source and are based on manufacturers specifications.

Methodology

Maximum Usage (gallons/yr) = Maximum number of parts coated per day x Maximum gallons per part X 365 day/yr
 Potential VOC Emissions (ton/yr) = Maximum Usage (gal/yr) x VOC Content As Applied (lb/gal) / 2,000 lbs/ton
 Potential Xylene Emissions (ton/yr) = Maximum Usage (gal/yr) x Density (lb/gal) x Mixed Xylenes Content (wt %) / 2,000 lbs/ton
 Potential PM/PM10 Emissions (ton/yr) = Maximum Usage (gal/yr) x Solids Content (lb/gal) x (1 - Transfer Efficiency) / 2,000 lbs/ton
 Controlled PM/PM10 Emissions (ton/yr) = Potential PM/PM10 Emissions (ton/yr) x (1 - Filter Control Efficiency)

Short Term Emissions (EU PB-2)	
PM/PM-10 Potential	0.23 lb/hr
Mass Emission Rate @ 0.03 gr/dscf	2.06 lb/hr

Methodology

PM/PM-10 Potential (lb/hr) = PM/PM-10 Potential (ton/yr) X 2000 lb/ton / 8760 hr/yr
 PM/PM-10 Potential After control (lb/hr) = PM/PM-10 Potential (lb/hr) X (1 - control efficiency)
 Mass Emission Rate @ 0.03 gr/dscf (lb/hr) = 0.03 gr/dscf X 8000 dscfm X 60 min/hr / 7000 gr/lb

**Appendix A: Emission Calculations
Abrasive Blasting - SB-1**

Company Name: Major Tool and Machine, Inc.
Address City IN Zip: 1458 East 19th Street, Indianapolis, Indiana, 46218
Permit Number: F097-26430-00275
Pit ID: 097-00275
Reviewer: Jeffrey Hege
Date: 6/3/2008

Table 1 - Emission Factors for Abrasives

Abrasive	Emission Factor	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

Table 2 - Density of Abrasives (lb/ft3)

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)

Flow rate of Sand Through a Blasting Nozzle as a Function of Nozzle pressure and Internal Diameter

Internal diameter, in	Nozzle Pressure (psig)							
	30	40	50	60	70	80	90	100
1/8	28	35	42	49	55	63	70	77
3/16	65	80	94	107	122	135	149	165
1/4	109	138	168	195	221	255	280	309
5/16	205	247	292	354	377	420	462	507
3/8	285	355	417	477	540	600	657	720
7/16	385	472	560	645	755	820	905	940
1/2	503	615	725	835	945	1050	1160	1265
5/8	820	990	1170	1336	1510	1680	1850	2030
3/4	1140	1420	1670	1915	2160	2400	2630	2880
1	2030	2460	2900	3340	3780	4200	4640	5060

Calculations

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters

Flow Rate (FR) = Abrasive flow rate (lb/hr) with internal nozzle diameter (ID)

FR1 = Sand flow rate (lb/hr) with internal nozzle diameter (ID1) From Table 3 =

D = Density of abrasive (lb/ft3) From Table 2 =

D1 = Density of sand (lb/ft3) =

ID = Actual nozzle internal diameter (in) =

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

720
160
99
0.38
0.375

Flow Rate (FR) (lb/hr) = 720.000 per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Table 1 =

FR = Flow Rate (lb/hr) =

w = fraction of time of wet blasting =

N = number of nozzles =

0.010
720.000
0 %
1

Uncontrolled Emissions =	7.20 lb/hr
PM =	31.54 ton/yr
PM10 =	22.08 ton/yr

METHODOLOGY

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

Ton/yr = lb/hr X 8760 hr/yr X ton/2000 lbs

Flow Rate (FR) (lb/hr) = FR1 x (ID/ID1)² x (D/D1)

E = EF x FR x (1-w/200) x N

w should be entered in as a whole number (if w is 50%, enter 50)

Appendix A: Emissions Calculations
Emissions from Shot Blasting (EU: SB-2)

Company Name: Major Tool and Machine, Inc.
Address City IN Zip: 1458 East 19th Street, Indianapolis, Indiana, 46218
Permit Number: F097-26430-00275
Plt ID: 097-00275
Reviewer: Jeffrey Hege
Date: 6/3/2008

24 Maximum Number of Parts Shot Blasted Per Day
7,900 Maximum Weight per Part

189,600 Maximum lbs Part Blasted per Day

Product Name	Maximum Part Throughput (tons/yr)	PM Emission Factor (lb PM / ton Part)	PM10 Emission Factor (lb PM10 / ton Part)	Potential PM Emissions (tons/yr)	Potential PM10 Emissions (tons/yr)	Filter Control Efficiency (%)	Controlled Potential PM Emissions (tons/yr)	Controlled Potential PM10 Emissions (tons/yr)
Universai InviraPrime	34,602	17	1.7	294	29.4	99.8%	0.6	0.06

Notes

PM and PM10 Emission Factors for shot blasting are from FIRE version 6.25 (SCC 3-04-003-40)

Methodology

Maximum Part Throughput (ton/yr) = Maximum lbs Part Blasted per Day x 365 days/yr / 2,000 lbs/ton

Potential PM/PM10 Emissions (ton/yr) = Maximum Part Throughput (ton/yr) x PM/PM10 Emission Factor / 2,000 lbs/ton

Controlled PM/PM10 Emissions (ton/yr) = Potential PM/PM10 Emissions (ton/yr) x (1 - Filter Control Efficiency)

Short Term Emissions (EU SB-2)	
PM/PM-10 Potential	6.71 lb/hr
PM/PM-10 Potential After control	0.01 lb/hr
Mass Emission Rate @ 0.03 gr/dscf	3.24 lb/hr

Methodology

PM/PM-10 Potential (lb/hr) = PM/PM-10 Potential (ton/yr) X 2000 lb/ton / 8760 hr/yr

PM/PM-10 Potential After control (lb/hr) = PM/PM-10 Potential (lb/hr) X (1 - control efficiency)

Mass Emission Rate @ 0.03 gr/dscf (lb/hr) = 0.03 gr/dscf X 12600 dscfm X 60 min/hr / 7000 gr/lb

**Appendix A: Emissions Calculations
Emissions from Parts Cleaning (EU IPA-W)**

Company Name: Major Tool and Machine, Inc.
Address City IN Zip: 1458 East 19th Street, Indianapolis, Indiana, 46218
Permit Number: F097-26430-00275
Pit ID: 097-00275
Reviewer: Jeffrey Hege
Date: 6/3/2008

- 24 Maximum Number of Parts Shot Blasted Per Day
- 1 Maximum Number of IPA Wipe Containers Used Per Part
- 24 Maximum Number of IPA Wipe Containers Used Per Day
- 8760 Maximum Number of IPA Wipe Containers Used Per Year

Product Name	Maximum Containers per Year	Volume of Wipes per Container (gal)	Density of Wipes (lb/gal)	VOC Content of Wipes (wt %)	Potential VOC Emissions (lb/yr)	Potential VOC Emissions (ton/yr)
Alcohol Wipes	8,760	0.125	7.08	64.72	5,017	2.51

Methodology

Pollutant VOC Emissions (ton/yr) = Maximum Containers per Year x Volume of Wipes per Container x Density of Wipes (lb/gal) x VOC Content of Wipes (wt %) / 2,000 lbs/ton

**Appendix A: Emissions Calculations
Emissions from Welding Operations**

Company Name: Major Tool and Machine, Inc.
Address City IN Zip: 1458 East 19th Street, Indianapolis, Indiana, 46218
Permit Number: F097-26430-00275
Plt ID: 097-00275
Reviewer: Jeffrey Hege
Date: 6/3/2008

Emissions from Motoman Welding (MIG Welding)

2 MIG Welding Stations

Electrode E308

24 Maximum Number of Parts Shot Blasted Per Day
 11.89 Pounds of Weld Wire Used Per Part

 285.36 Maximum Pounds of Weld Wire Used per Day
 11.89 Maximum Pounds of Weld Wire Used per Hour
 104,156 Maximum Pounds of Weld Wire Used per Year

PM/PM10 Emission Factor (lb/1000 lb)	Cr Emission Factor (lb/10000 lb)	Co Emission Factor (lb/10000 lb)	Mn Emission Factor (lb/10000 lb)	Ni Emission Factor (lb/10000 lb)	PM/PM10 Emissions (tons/yr)	Cr Emissions (tons/yr)	Co Emissions (tons/yr)	Mn Emissions (tons/yr)	Ni Emissions (tons/yr)	Total HAP Emissions (tons/yr)
5.4	5.24	0.01	3.46	1.84	0.281	0.027	0.000	0.018	0.010	0.055

Emissions from Submerged Arc Welding (Flux Cored Welding)

3 Flux Cored Welding Stations

Electrode E308 (no determined HAP factors so E308 for FCAW, so used factors for electrode E11018 for FCAW in AP-42)

24 Maximum Number of Parts Shot Blasted Per Day
 23.39 Pounds of Weld Wire Used Per Part

 561.36 Maximum Pounds of Weld Wire Used per Day
 23.39 Maximum Pounds of Weld Wire Used per Hour
 204,896 Maximum Pounds of Weld Wire Used per Year

PM/PM10 Emission Factor (lb/1000 lb)	Cr Emission Factor (lb/10000 lb)	Co Emission Factor (lb/10000 lb)	Mn Emission Factor (lb/10000 lb)	Ni Emission Factor (lb/10000 lb)	PM/PM10 Emissions (tons/yr)	Cr Emissions (tons/yr)	Co Emissions (tons/yr)	Mn Emissions (tons/yr)	Ni Emissions (tons/yr)	Total HAP Emissions (tons/yr)
9.1	9.69	ND	7.04	1.02	0.932	0.099	ND	0.072	0.010	0.182

Notes

Emission Factors for MIG welding and flux cored welding are based on AP-42 Chapter 12.19 Tables 12.19-1 and 12.19-2

Methodology

Pollutant Emissions (ton/yr) = Maximum lbs of weld wire used per year x Emission Factor / 2,000 lbs/ton

Appendix A: Emissions Calculations
Emissions from Natural Gas Combustion

Company Name: Major Tool and Machine, Inc.
Address City IN Zip: 1458 East 19th Street, Indianapolis, Indiana, 46218
Permit Number: F097-26430-00275
Plt ID: 097-00275
Reviewer: Jeffrey Hege
Date: 6/3/2008

Emissions from Natural Gas Combustion for Comfort Heat

Unit Descriptions	Maximum Heat Input Capacity Per Unit [MMBtu/hr]	Number of Units	Combined Maximum Heat Input Capacity [MMBtu/hr]	Potential Natural Gas Usage [scf/hr]
BH-200 infrared	0.200	5	1.000	1,000
UDAP-400 Reznor	0.400	3	1.200	1,200
IFP-42-d Applied Air	0.800	6	4.800	4,800
Total:				7,000

Potential Emissions:			
Pollutant	Emission Factor [lb/MMscf]	Potential Emissions [lb/hr]	Potential Emissions [tpy]
NO _x	100	0.70	3.07
CO	84	0.59	2.58
VOC	5.5	0.04	0.17
SO ₂	0.6	0.00	0.02
PM	1.9	0.01	0.06
PM ₁₀	7.6	0.05	0.23
Benzene	2.1E-03	0.00	0.000
Dichlorobenzene	1.2E-03	0.00	0.000
Formaldehyde	7.5E-02	0.00	0.002
Hexane	1.8E+00	0.01	0.055
Toluene	3.4E-03	0.00	0.000
Lead	5.0E-04	0.00	0.000
Cadmium	1.1E-03	0.00	0.000
Chromium	1.4E-03	0.00	0.000
Manganese	3.8E-04	0.00	0.000
Nickel	2.1E-03	0.00	0.000
Combined HAPs	N/D	0.013	0.058

Notes

Assumed heating value of natural gas to be 1,000 Btu/scf.

Emission factors are from AP-42, Tables 1.4-1 and 1.4-2.

Utilized the NO_x and CO emission factors for an uncontrolled small boiler (i.e. < 100 MMBtu/hr heat input).

All emission factors are for normal firing. The PM/PM₁₀ emission factor is filterable and condensable particulate combined.

The HAPs above include the 5 organic HAPs and 5 metal HAPs with the highest emission factors.

Methodology

Potential Natural Gas Usage [scf/hr] = Combined Maximum Heat Input Capacity [MMBtu/hr] x 1,000,000 Btu/MMBtu / 1,000 Btu/scf

Potential Emissions [lb/hr] = Total Potential Natural Gas Usage [scf/hr] / 1,000,000 scf/MMscf x Emission Factor [lb/MMscf]

Potential Emissions [tpy] = Potential Emissions [lb/hr] x 8,760 hr/yr / 2,000 lb/ton

**Appendix A: Emissions Calculations
Emissions from Insignificant Activities**

Company Name: Major Tool and Machine, Inc.
Address City IN Zip: 1458 East 19th Street, Indianapolis, Indiana, 46218
Permit Number: F097-26430-00275
Pit ID: 097-00275
Reviewer: Jeffrey Hege
Date: 6/3/2008

Emissions from Increase of Hand-wipe Cleaning

220 Gallons of Isopropanol Per Year Currently Permitted
 600 Gallons of Isopropanol Per Year Requested Total

 380 Increase in Permitted Gallons of Isopropanol Per Year Consumption

Product Name	Increase in Usage (gal/yr)	Density of Isopropanol (lb/gal)	VOC Content of Isopropanol (lb/gal)	Potential VOC Emissions (lb/yr)	Potential VOC Emissions (ton/yr)
Isopropanol	380	6.60	6.37	2,421	1.21

Methodology

Pollutant VOC Emissions (ton/yr) = Increase in Usage (gal/yr) x VOC Content of Isopropanol (lb/gal) / 2,000 lbs/ton

Appendix A: Emissions Calculations
Emissions from Insignificant Activities

Company Name: Major Tool and Machine, Inc.
Address City IN Zip: 1458 East 19th Street, Indianapolis, Indiana, 46218
Permit Number: F097-26430-00275
Pit ID: 097-00275
Reviewer: Jeffrey Hege
Date: 6/3/2008

EMISSIONS RESULTING FROM SPRAY TOUCH UP OF PRODUCTION ITEMS

Product	Density (lb/gal)	VOC (lb/gal)	Annual Usage (# of Cans)	Worst Case Usage (# of Cans)	Ounces per Can	Worst Case Annual Usage (gal)	VOC Emission (lb/day)	Worst Case VOC emissions (ton/yr)	HAP Emissions Combined (Wt %)	Potential Combined HAP Emissions (tons/yr)
Flat Black	5.94	3.40	12	24	10	1.88	0.017	0.003	16.0%	0.001
Krylon 1311	6.10	4.90	66	132	11	11.34	0.152	0.028	50.0%	0.017
Contact Cleaner	5.56	5.56	36	72	12	6.75	0.103	0.019	3.0%	0.001
Emissions - lb/day							0.273			0.019
Subtotal Annual Emissions - TPY								0.050		

EMISSIONS RESULTING FROM METAL INSPECTION

Material	Density (lb/gal)	VOC (lb/gal)	Actual Daily Usage (gal/day)	Worst Case Daily Usage (gal/day)	Worst Case Annual Usage (gal)	Worst Case VOC Emissions (lb/day)	Worst Case VOC emissions (ton/yr)	HAP Emissions Combined (Wt %)	Potential Combined HAP Emissions (tons/yr)
DP-51 penetrant	7.24	8.34E-06	0.256	0.512	186.88	0.000	0.000	0.0%	0.000
D-100 developer	7.53	6.13E-03	0.48	0.96	350.4	0.006	0.001	0.0%	0.000
HM-406 penetrant	8.10	0.00E+00	0.032	0.064	23.36	0.000	0.000	0.0%	0.000
DR-60 cleaner	6.43	6.26E-03	0.096	0.192	70.08	0.001	0.000	0.0%	0.000
ZL-67 penetrant	8.26	7.43E-01	0.19	0.38	138.7	0.282	0.051	0.0%	0.000
Emissions - lb/day						0.289			0.000
Subtotal Annual Emissions - TPY							0.053		

EMISSIONS RESULTING FROM SELF CONTAINED SPRAY GUN AND LINE CLEANER

Product	Density (lb/gal)	VOC (lb/gal)	Annual Usage (gal)	Worst Case Annual Usage (gal)	Worst Case VOC Emission (Lbs/day)	Worst Case VOC emissions (ton/yr)	HAP Emissions Combined (%)	Potential Combined HAP Emissions (tons/yr)
Lacquer Thinner	6.70	6.70	110	220	4.038	0.737	75.0%	0.553
Emissions - lb/day						4.038		0.553
Total Annual Emissions - TPY							0.737	

EMISSIONS FROM PROTECTIVE METAL COATING APPLICATION

Product	Density (lb/gal)	VOC (lb/gal)	Annual Usage (gal)	Worst Case Annual Usage (gal)	Worst Case VOC Emission (Lbs/day)	Worst Case VOC emissions (ton/yr)	HAP Emissions Combined (Wt %)	Potential Combined HAP Emissions (tons/yr)
WOCO Penetrating Oil 40	6.70	6.03	55	110	1.817	0.332	5%	0.018
Emissions - lb/day						1.817		0.018
Subtotal Annual Emissions - TPY							0.332	

EMISSIONS RESULTING FROM CLEANER AND SOLVENT USAGE

Product	Density (lb/gal)	VOC (lb/gal)	Annual Usage (gal)	Worst Case Annual Usage (gal)	Worst Case VOC Emission (Lbs/day)	Worst Case VOC emissions (ton/yr)	HAP Emissions Combined (Wt %)	Potential Combined HAP Emissions (tons/yr)
Isopropanol	6.60	6.37	85	170	2.967	0.541	0.0%	0.000
Acetone	6.60	6.31	Exempt				0.0%	
Emissions - lb/day						2.967		0.000
Subtotal Annual Emissions - TPY							0.541	

EMISSIONS RESULTING FROM DEGASSING AND CLEANING TO PREPARE FOR INTERNAL REPAIR

Product	Density (lb/gal)	VOC (lb/gal)	Annual Usage (gal)	Worst Case Annual Usage (gal)	Worst Case VOC Emission (Lbs/day)	Worst Case VOC emissions (ton/yr)	HAP Emissions Combined (Wt %)	Potential Combined HAP Emissions (tons/yr)
Degassing (inert gases released)						0.000	0.0%	0.000
Isopropanol	6.60	6.37	25	50	0.873	0.159	0.0%	0.000
Acetone	6.60	6.31	Exempt				0.0%	
Emissions - lb/day						0.873		0.000
Subtotal Annual Emissions - TPY							0.159	

TOTAL POTENTIAL VOC EMISSIONS - TPY 1.87

TOTAL COMBINED HAP EMISSIONS - TPY 0.59

Appendix A: Emissions Calculations
Limited PTE After Revision

Company Name: Major Tool and Machine, Inc.
Address City IN Zip: 1458 East 19th Street, Indianapolis, Indiana, 46218
Permit Number: F097-26430-00275

Pit ID: 097-00275
Reviewer: Jeffrey Hege
Date: 6/3/2008

Emissions Unit	Limited Potential to Emit After Revision (tons/year)									
	PM	PM-10	SO ₂	NOx	VOC	CO	HAPs		Combined	
							Highest Individual	Combined		
Surface Coating Booth (EU PB-1)	39.22	39.22	0	0	40.34	0				
Surface Coating Booth (EU PB-2)	0.93	0.93	0	0	30.66	0				
Clean-up solvent usage (EU PB-2)	0.00	0.00	0	0	23.50	0				
Shot Blasting (EU SB-1)	31.54	22.08	0	0	0	0				
Shot Blasting (EU SB-2)	14.19 ^A	14.19 ^A	0	0	0	0				
Insignificant Activities										
IPA Wipes (EU IPA-W)	0	0	0	0	2.51	0				
Welding Operations (EU WO)	1.21	1.21	0	0	0	0				
Natural Gas Combustion (EU NGC)	0.16	0.43	0.02	6.09	0.37	2.58				
Isopropyl Alcohol Cleaning (EU IPA)	0	0	0	0	1.21	0				
Touch-up paint	0	0	0	0	0.05	0				
Metal inspection	0	0	0	0	0.053	0				
Spray gun cleaning (EU PB-1)	0	0	0	0	0.737	0				
Protective metal coating	0	0	0	0	0.332	0				
Misc. cleaning	0	0	0	0	0.159	0				
TOTALS	< 250	< 100	0.02	3.07	99.92	2.58	< 10	< 10	< 25	

^A This Limited PTE was calculated as follows: (0.03 gr/dscf X 12600 dscf/min X 60 min/hr / 7000 gr/lb) X 8760 hrs/yr / 2000 lbs/ton

Short Term Emissions (EU PB-1)	
PMPM-10 Potential	8.95 lb/hr
Mass Emission Rate @ 0.03 gr/dscf	10.29 lb/hr

PMPM-10 Potential (lb/hr) = PMPM-10 Potential (ton/yr) X 2000 lb/ton / 8760 hr/yr
Mass Emission Rate @ 0.03 gr/dscf (lb/hr) = 0.03 gr/dscf X 40000 dscfm X 60 min/hr / 7000 gr/lb

Short Term Emissions (EU SB-1)	
PMPM-10 Potential	5.04 lb/hr
Mass Emission Rate @ 0.03 gr/dscf	5.91 lb/hr

PMPM-10 Potential (lb/hr) = PMPM-10 Potential (ton/yr) X 2000 lb/ton / 8760 hr/yr
PMPM-10 Potential After control (lb/hr) = PMPM-10 Potential (lb/hr) X (1 - control efficiency)
Mass Emission Rate @ 0.03 gr/dscf (lb/hr) = 0.03 gr/dscf X 23000 dscfm X 60 min/hr / 7000 gr/lb