



DATE: August 22, 2008

TO: Interested Parties / Applicant

RE: EDCO Welding / E097-26661-00645

FROM: Kyle Walker
Deputy Director

Notice of Decision – Approval

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

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

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

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

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

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

Enclosures



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

Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

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



August 22, 2008

Mr. Eddie Van Meter
EDCO Welding
3015 Chase Street
Indianapolis, IN 46217

Certified Mail Number: 7008 0150 0003 5219 3998

Re: Exempt Operation Status,
E097-26661-00645

Dear Mr. Van Meter:

The application from EDCO Welding, received on June 16, 2008, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following stationary welding repair operation, located at 3015 Chase Street, Indianapolis, Indiana, 46217, is classified as exempt from air pollution permit requirements:

- (a) Three (3) Metal Inert Gas (MIG) welding stations, identified as EU 1, EU 2, and EU 3, constructed in January, 2008, each with a maximum capacity of 0.27 pounds per hour of welding wire, using no control, and exhausting indoors.
- (b) Two (2) oxyacetylene flame cutting torches, identified as EU 4 and EU 5, constructed in January, 2008, each with a maximum capacity of fifteen (15) inches per minute at a 1/2 inch thickness, using no control, and exhausting indoors.
- (c) One (1) plasma cutter, identified as EU 6, constructed in January, 2008, with a maximum capacity of one hundred (100) inches per minute at a 1/2 inch thickness, using no control, and exhausting indoors.

The following conditions shall be applicable:

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

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



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

Department of Public Works
Office of Environmental Services

2700 Belmont Avenue
Indianapolis, IN 46221

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

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

Sincerely,

ORIGINAL SIGNED BY

Kyle Walker
Deputy Director
Department of Public Works

mmd

cc: OES Files - 2 copies
Compliance - Matt Mosier
Marion County Health Dept.
IDEM, Mindy Hahn

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

Technical Support Document (TSD) for an Exemption

Source Description and Location

Source Name: EDCO Welding
Source Location: 3015 Chase Street, Indianapolis, IN 46217
County: Marion
SIC Code: 7692
Exemption No.: E097-26661-00645
Permit Reviewer: Monica Doyle

On June 16, 2008, the Indiana Department of Environmental Management (IDEM) Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) received an application from EDCO Welding related to the operation of an existing stationary welding repair operation.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11 th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O ₃	Attainment effective 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.	

Pollutant	Designation
Basic Nonattainment effective April 5, 2005 for PM2.5.	

(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) PM2.5

Marion County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. On May 8th, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Therefore, direct PM2.5 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 PM10, SO₂, NO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(d) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Fugitive Emissions

The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-1.1-3 (Exemptions) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed an application, submitted by EDCO Welding on June 16, 2008, relating to an existing stationary welding repair operation.

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

- (a) Three (3) Metal Inert Gas (MIG) welding stations, identified as EU 1, EU 2, and EU 3, constructed in January, 2008, each with a maximum capacity of 0.27 pounds per hour of welding wire, using

no control, and exhausting indoors.

- (b) Two (2) oxyacetylene flame cutting torches, identified as EU 4 and EU 5, constructed in January, 2008, each with a maximum capacity of fifteen (15) inches per minute at a 1/2 inch thickness, using no control, and exhausting indoors.
- (c) One (1) plasma cutter, identified as EU 6, constructed in January, 2008, with a maximum capacity of one hundred (100) inches per minute at a 1/2 inch thickness, using no control, and exhausting indoors.

Enforcement Issues

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

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Exemption

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

Process/Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
EU 1, EU 2, EU 3	0.018	0.018	0.018	-	-	-	-	negl.	negl.
EU 4, EU 5	0.64	0.64	0.64	-	-	-	-	negl.	negl.
EU 6	0.10	0.10	0.10	-	-	-	-	negl.	negl.
Total PTE of Entire Source	0.76	0.76	0.76	-	-	-	-	negl.	negl.
Exemption Levels	5	5	5	10	10	5 or 10	25	2.5	1
Registration Levels	25	25	25	25	25	25	100	-	-

negl. = negligible
 * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of all regulated criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(e)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3 (Exemptions).
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-1.1-3 (Exemptions)
Exemption applicability is discussed under the Permit Level Determination – Exemption section above.
- (b) 326 IAC 2-1.1-5 (Non-attainment New Source Review)
This source is not major under non-attainment NSR because it has the potential to emit less than 100 tons of PM-2.5 and SO₂. Therefore, the Non-attainment New Source Review requirements are not applicable.
- (c) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major source. This source is not one (1) of the twenty-eight (28) listed source categories. The potential to emit each criteria pollutant from the entire source is less than 250 tons per year. Therefore, this source is a minor source and the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) Requirements) are not applicable.
- (d) 326 IAC 2-4.1 (Hazardous Air Pollutants)
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1(a)(1), (2), and (3), this source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit under 326 IAC 2-7, it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year, and it is not located in Lake or Porter Counties.
- (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 the permit:
 - (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

- (g) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(9), the source is not subject to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) because less than six hundred twenty-five (625) pounds of rod or wire is consumed per day.
- (h) 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.
- (i) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source does not have the potential to emit twenty-five (25) tons per year of fugitive particulate matter, and is exempt from air pollution permit requirements. Therefore, 326 IAC 6-5 does not apply.
- (j) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited potential to emit of VOC from each emission unit is less than twenty-five (25) tons per year.

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 June 16, 2008.

The operation of this source shall be subject to the conditions of the attached proposed Exemption No. 097-26661-00645. The staff recommends to the Commissioner that this Exemption be approved.

OES Contact

- (a) Questions regarding this proposed exemption can be directed to Monica Doyle at Indianapolis Office of Environmental Services, Permits Section, 2700 South Belmont, Indianapolis, Indiana 46221 or by telephone at (317) 327-2846.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov.

Appendix A: Emissions Calculations

Welding and Thermal Cutting

Company Name: EDCO Welding
 Address City IN Zip: 3015 Chase Street, Indianapolis, IN 46217
 Permit Number: E097-26661-00645
 Reviewer: Monica Doyle
 Date: July 16, 2008

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr		
WELDING												
Submerged Arc	0	0	0.036	0.011			0.000	#####	#####	#####	0.00E+00	
Metal Inert Gas (MIG)(carbon steel)	3	0.27	0.0055	0.0005	0.000001	0.000001	0.004	4.0500E-04	8.1000E-07	8.1000E-07	4.07E-04	
Stick (E7018 electrode)	0	0	0.0211	0.0009	0.000005	0.000005	0.000	#####	#####	#####	0.00E+00	
Tungsten Inert Gas (TIG)(carbon steel)	0	1	0.0055	0.0005			0.000	#####	#####	#####	0.00E+00	
Oxyacetylene(carbon steel)	0	0	0.0055	0.0005			0.000	#####	#####	#####	0.00E+00	
FLAME CUTTING												
PROCESS	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	2	0.5	15	0.1622	0.0005	0.0001	0.0003	0.146	3.65E-05	7.30E-09	1.46E-13	3.65E-05
Oxymethane	0			0.0815	0.0002		0.0002	0.000	0.00E+00	0.00E+00	0.00E+00	0.00E+00
Plasma**	1	0.5	100	0.0039				0.023	0.00E+00	0.00E+00	0.00E+00	0.00E+00
EMISSION TOTALS												
Potential Emissions lbs/hr								0.174	4.41E-04	8.17E-07	8.10E-07	4.43E-04
Potential Emissions lbs/day								4.172	1.06E-02	1.96E-05	1.94E-05	1.06E-02
Potential Emissions tons/year								0.761	1.93E-03	3.58E-06	3.55E-06	1.94E-03

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" t

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lb