INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

DATE: January 21, 2009

TO: Interested Parties / Applicant

RE: Geiger & Peters, Inc. / F097-26845-00135

FROM: Iryn Calilung, Section Chief
Permits Branch
IDEM, Office of Air Quality

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 Iryn Calilung, Section Chief, Permits Branch, IDEM, Office of Air Quality at (317) 233-5692.

Enclosures

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Federally Enforceable State Operating Permit Renewal
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

Geiger & Peters, Inc.
761 South Sherman Drive
Indianapolis, Indiana 46203

(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. 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.

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.

Operation Permit No.: F097-26845-00135	
Issued by: Iryn Calilung, Section Chief Permits Branch IDEM, Office of Air Quality	Issuance Date: January 21, 2009 Expiration Date: January 21, 2019

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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 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 structural metal fabrication operation.

Source Address:	761 South Sherman Drive, Indianapolis, Indiana 46203
Mailing Address:	P.O. Box 33807, Indianapolis, IN 46203
General Source Phone Number:	317-359-9521
SIC Code:	3441
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Nonattainment NSR Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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) Irvin Industries Horizontal Roller Blast Machine identified as Emission Unit ID Horizontal Roller Blast Machine. Model number 100-1m-10. Maximum unit capacity of 3,900 pounds of steel shot/grit cycled per hour. Equipped with one (1) reverse flow baghouse for particulate matter control, identified as Control Equipment ID CE #1, and exhausting to Stack/Vent ID CE #1. Installation date of 1982, modified last in 2006.

(b) One (1) Graco Spray Painting Operation utilizing three (3) airless spray painting guns identified as Emission Unit ID Spray Painting. Fabricated steel beams and other miscellaneous metal parts are spray painted inside the manufacturing building and are not directly exhausted to any control equipment or Stack/Vent ID. Maximum rated capacity to apply coatings is 1.0 gallon of coating per unit and 3.23 units per hour. Emission Unit ID Spray Painting includes the use of Hydro-Zinc, Theme-Zinc, and F.C. Typoxy coatings, used un-thinned, i.e. no thinners or solvents are used in the coating. Installation date of 1905, modified last in 2007.

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:

(a) Natural gas-fired combustion sources with heat input equal or less than ten (10) million Btu per hour.

(b) Machining where an aqueous cutting coolant continuously floods the machining surface.

(c) The following equipment related to manufacturing activities resulting in negligible emissions of HAPs: flame cutting torches and welding equipment.

(d) Any of the following structural steel and bridge fabrication activities: Cutting 200,000 linear feet or less of one (1) inch plate or equivalent and/or using eighty (80) tons or less of welding consumables.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(f) Paved and unpaved roads and parking lots with public access.

(g) Other activities not previously identified (by category) with emissions equal to or less than Insignificant Activity thresholds: drilling holes, saw cutting, grinding, and punching metal beams and plates.

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) to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 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.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F097-26845-00135, 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) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6] [IC 13-17-12]

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

B.5 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.6 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 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 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. One (1) certification may cover multiple forms in one (1) submittal.

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

B.9 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 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

(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 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, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ 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.11 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) 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.

(b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ 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 PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) 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.12 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 describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

(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

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 an "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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ 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 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.

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

(a) All terms and conditions of permits established prior to F097-26845-00135 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

B.14 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.15 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 Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "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.16 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 Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "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 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 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 at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 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 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 an "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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) 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 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 any additional information identified as being needed to process the application.

B.18 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

Any such application shall be certified by an "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.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

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

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in 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

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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ 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 emissions increases and decreases at 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, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification 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.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, and 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.22 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

The application which shall be submitted by the Permittee does require the certification by an "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.23 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 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 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.

(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) Pursuant to 326 IAC 2-2 (PSD), 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.

(c) 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.

(d) Section D of this permit contains independently enforceable provisions to satisfy these requirements.

C.3 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.4 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.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.6 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.7 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

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 an "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.8 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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ 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 an "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 not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ 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.9 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.10 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 within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

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

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on July 27, 2004.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 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 Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 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.16 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 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 that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.17 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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner 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 or ninety (90) days of initial startup, whichever is later.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.19 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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) Irvin Industries Horizontal Roller Blast Machine identified as Emission Unit ID Horizontal Roller Blast Machine. Model number 100-1m-10. Maximum unit capacity of 3,900 pounds of steel shot/grit cycled per hour. Equipped with one (1) reverse flow baghouse for particulate matter control, identified as Control Equipment ID CE #1, and exhausting to Stack/Vent ID CE #1. Installation date of 1982, modified last in 2006.

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

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

D.1.1 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations except Lake County), PM emissions from Emission Unit ID Horizontal Roller Blast Machine shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

D.1.2 Particulate Matter Ten (10) Microns or Less (PM10), and PM2.5 [326 IAC 2-8] [326 IAC 2-1.1-5]

Pursuant to 326 IAC 2-8-4 and 326 IAC 2-1.1-5:

(a) The PM10 emissions from the Horizontal Roller Blast Machine, identified as Emission Unit ID Horizontal Roller Blast Machine, shall not exceed 2.25 pounds per hour (lb/hr).

(b) The PM2.5 emissions from the Horizontal Roller Blast Machine, identified as Emission Unit ID Horizontal Roller Blast Machine, shall not exceed 2.25 pounds per hour (lb/hr).

Compliance with these emission limits, combined with the potential emissions from all other units at this source will limit the source-wide potential to emit of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-1.1-5 (Nonattainment NSR) are not applicable.

D.1.3 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 the Emission Unit ID Horizontal Roller Blast Machine and its emission control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

No later than five (5) years from April 10, 2007, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM testing for Emission Unit ID Horizontal Roller Blast Machine utilizing methods as approved by the IDEM Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.5 Particulate Matter

(a) In order to comply with Condition D.1.1 and Condition D.1.2, the control equipment for PM, PM10 and PM2.5 for Emission Unit ID Horizontal Roller Blast Machine, identified as CE #1, shall be in operation at all times when Emission Unit Horizontal Roller Blast Machine is in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.1.6 Visible Emissions Notations

(a) Once per day visible emission notations of the CE #1 stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with the section mentioned above, shall be considered a deviation from this permit.

D.1.7 Baghouse Parametric Monitoring - Pressure Readings

(a) The Permittee shall record the pressure drop across the baghouse controlling the blasting machine, identified as Control Equipment ID CE #1, at least once per day when the blasting machine is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 to 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable steps in accordance with Section C - Response to Excursions or 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 or Exceedances, shall be considered a deviation from this permit.

(b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.8 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 have 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 no later than the completion of the processing of the material in the line. 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.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.6, the Permittee shall maintain daily records of visible emission notations of the Emission Unit ID Horizontal Roller Blast Machine stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).

(b) To document compliance with Condition D.1.7, the Permittee shall maintain daily records of pressure drop readings of the Control Equipment ID CE #1. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of notation (e.g., the process did not operate that day).

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) One (1) Graco Spray Painting Operation utilizing three (3) airless spray painting guns identified as Emission Unit ID Spray Painting. Fabricated steel beams and other miscellaneous metal parts are spray painted inside the manufacturing building and are not directly exhausted to any control equipment or Stack/Vent ID. Maximum rated capacity to apply coatings is 1.0 gallon of coating per unit and 3.23 units per hour. Emission Unit ID Spray Painting includes the use of Hydro-Zinc, Theme-Zinc, and F.C. Typoxy coatings, used un-thinned, i.e. no thinners or solvents are used in the coating. Installation date of 1905, modified last in 2007.

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

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

D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings as applied 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 coatings.

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.

D.2.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-8] [326 IAC 2-4.1] [40 CFR 63]

Pursuant to FESOP 097-17400-00135 and 326 IAC 2-8, the hazardous air pollutant (HAP) emissions shall be limited as follows:

(a) The individual HAP usage for the Graco Spray Painting Operation, identified as Emission Unit ID Spray Painting shall be limited to 9.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The combined HAP usage for the Graco Spray Painting Operation, identified as Emission Unit ID Spray Painting shall be limited to 17.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these emission limits, combined with the potential emissions from all other units at this source will also limit single HAP to less than 10 tons per twelve (12) consecutive month period and combination HAPs to less than 25 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program), 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants), and 40 CFR 63 are not applicable.

D.2.3 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations except Lake County), PM emissions from the Emission Unit ID Spray Painting shall not exceed 0.03 grain per dry standard cubic foot of exhaust air.

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 Emission Unit ID Spray Painting and its emission control devices.

Compliance Determination Requirements

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.6 Hazardous Air Pollutants (HAP) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the HAP content and usage limitations contained in Condition D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.7 Monitoring

Should overspray emissions from Emission Unit ID Spray Painting be directed to the outside air:

(a) Weekly observations shall be made of the overspray originating from the surface coating area while one or more of the paint guns are in operation. If a condition exists which would result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Condition C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) Monthly inspections shall be performed of the coating emissions from the surface coating area and the presence of overspray on the nearby ground outside of this designated surface coating area. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Condition C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.2.8 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limit established in Condition D.2.1.

(1) The type, amount, and VOC content of each coating material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) A log of the dates of use;

(3) The VOC content of the coatings used, as applied, for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limit(s) established in Condition D.2.2.

(1) The amount and HAP content of each coating material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) A log of the dates of use;

(3) Any single HAP usage for each month;

(4) The weight of any single HAP emitted for each calendar month, considering capture and control efficiency, if applicable;

(c) To document compliance with Condition D.2.7, the Permittee shall maintain records of weekly and monthly observations of the overspray from surface coating area while one or more of the paint guns are in operation.

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

D.2.9 Reporting Requirements

A quarterly summary to document compliance with Condition D.2.2 - Hazardous Air Pollutants, shall be submitted to the address(es) listed in Condition C - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 EMISSION UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-8-4(10)]- Insignificant Activities:

(c) This stationary source also includes the following insignificant activities:

(1) Natural gas-fired combustion sources with heat input equal or less than ten (10) million Btu per hour.

(2) Machining where an aqueous cutting coolant continuously floods the machining surface.

(3) The following equipment related to manufacturing activities resulting in negligible emissions of HAPs: flame cutting torches and welding equipment.

(4) Any of the following structural steel and bridge fabrication activities: Cutting 200,000 linear feet or less of one (1) inch plate or equivalent and/or using eighty (80) tons or less of welding consumables.

(5) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(6) Paved and unpaved roads and parking lots with public access.

(7) Other activities not previously identified (by category) with emissions equal to or less than Insignificant Activity thresholds: drilling holes, saw cutting, grinding, and punching metal beams and plates.

(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) [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations expect Lake County), PM emissions from insignificant activities shall not exceed 0.03 per dry standard cubic foot of exhaust air.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Geiger & Peters, Inc.
Source Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
Mailing Address: 761 South Sherman Drive, Indianapolis, IN 46203
FESOP Permit No.: F097-26845-00135

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Geiger & Peters, Inc.
Source Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
Mailing Address: 761 South Sherman Drive, Indianapolis, IN 46203
FESOP Permit No.: F097-26845-00135

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 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), 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

FESOP Quarterly Report

Source Name: Geiger & Peters, Inc.
Source Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
Mailing Address: 761 South Sherman Drive, Indianapolis, IN 46203
FESOP Permit No.: F097-26845-00135
Facility: Emission Unit ID Spray Painting
Parameter: Monthly Single HAP and Combined HAP Limitation
Limit:

(a) The individual HAP usage for the Graco Spray Painting Operation, identified as Emission Unit ID Spray Painting shall be limited to 9.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The combined HAP usage for the Graco Spray Painting Operation, identified as Emission Unit ID Spray Painting shall be limited to 17.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:_____

Month	Column 1		Column 2		Column 1 + Column 2	
	This Month		Previous 11 Months		12 Month Total	
	Single worst HAP	Combined HAPs	Single worst HAP	Combined HAPs	Single worst HAP	Combined HAPs
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

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

Source Name: Geiger & Peters, Inc.
Source Address: 761 South Sherman Drive, Indianapolis, Indiana 46203
Mailing Address: 761 South Sherman Drive, Indianapolis, IN 46203
FESOP Permit No.: F097-26845-00135

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ANo deviations occurred this reporting period@.

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ 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

Addendum to the Technical Support Document for a Federally Enforceable State Operating Permit Renewal

Source Name:	**Geiger & Peters, Inc.**
Source Location:	**761 South Sherman Drive, Indianapolis, Indiana 46203**
County:	**Marion**
SIC Code:	**3441**
Permit Renewal No.:	**F097-26845-00135**
Permit Reviewer:	**Linda Quigley/EVP**

On December 17, 2008, the Office of Air Quality (OAQ) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Geiger & Peters, Inc. had applied to renew a Federally Enforceable State Operating Permit (FESOP) to continue to operate a structural metal fabrication operation. The notice also stated that OAQ 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 December 29, 2008, August Mack Environmental, on behalf of Geiger & Peters, Inc., submitted one (1) public notice comment on the draft FESOP Renewal. Upon further review, OAQ has decided to make the following revision to the FESOP Renewal. 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 comment and response, including changes to the permit, is as follows:

Comment 1

Condition D.2.8(b)(5) requires the source to "identify the facility or facilities associated with the usage of each HAP." There is only one coating operation listed in Section D.2, so the intention of the condition is unclear.

Response 1

Section D.2 contains only one (1) emission unit, the Graco Spray Painting Operation, and this emission unit has hazardous air pollutant (HAP) emissions limitations in Condition D.2.2. Condition D.2.8(b) contains record keeping requirements for HAP from the Graco Spray Painting Operation. Therefore, Condition D.2.8(b)(5) is not required and Condition D.2.8(b) is revised as follows:

D.2.8 Record Keeping Requirements

...

(b) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through **(4)** ~~(5)~~ below. Records maintained for (1) through **(4)** ~~(5)~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP emission limit(s) established in Condition D.2.2.

(1) The amount and HAP content of each coating material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) A log of the dates of use;

(3) Any single HAP usage for each month;

(4) The weight of any single HAP emitted for each calendar month, considering capture and control efficiency, if applicable;

~~(5) Identification of the facility or facilities associated with the usage of each HAP.~~

(c) To document compliance with Condition D.2.7, the Permittee shall maintain records of weekly and monthly observations of the overspray from surface coating area while one or more of the paint guns are in operation.

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

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	**Geiger & Peters, Inc.**
Source Location:	**761 South Sherman Drive, Indianapolis, Indiana 46203**
County:	**Marion**
SIC Code:	**3441**
Permit Renewal No.:	**F097-26845-00135**
Permit Reviewer:	**Linda Quigley/EVP**

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application, F097-26845-00135, from Geiger & Peters, Inc. relating to the operation of a structural metal fabrication operation.

History

On August 6, 2008, Geiger & Peters, Inc. submitted an application to the OAQ requesting to renew its operating permit. Geiger & Peters was issued a FESOP Renewal (F097-17400-00135) on May 17, 2004 and a Significant Permit Revision (SPR097-21739-00135) on June 5, 2007.

Permitted Emission Units and Pollution Control Equipment

(a) One (1) Irvin Industries Horizontal Roller Blast Machine identified as Emission Unit ID Horizontal Roller Blast Machine. Model number 100-1m-10. Maximum unit capacity of 3,900 pounds of steel shot/grit cycled per hour. Equipped with one (1) reverse flow baghouse for particulate matter control, identified as Control Equipment ID CE #1, and exhausting to Stack/Vent ID CE #1. Installation date of 1982, modified last in 2006.

(b) One (1) Graco Spray Painting Operation utilizing three (3) airless spray painting guns identified as Emission Unit ID Spray Painting. Fabricated steel beams and other miscellaneous metal parts are spray painted inside the manufacturing building and are not directly exhausted to any control equipment or Stack/Vent ID. Maximum rated capacity to apply coatings is 1.0 gallon of coating per unit and 3.23 units per hour. Emission Unit ID Spray Painting includes the use of Hydro-Zinc, Theme-Zinc, and F.C. Typoxy coatings, used un-thinned, i.e. no thinners or solvents are used in the coating. Installation date of 1905, modified last in 2007.

Insignificant Activities

This stationary source also includes the following insignificant activities:

(a) Natural gas-fired combustion sources with heat input equal or less than ten (10) million Btu per hour.

(b) Machining where an aqueous cutting coolant continuously floods the machining surface.

(c) The following equipment related to manufacturing activities resulting in negligible emissions of HAPs: flame cutting torches and welding equipment.

(d) Any of the following structural steel and bridge fabrication activities: Cutting 200,000 linear feet or less of one (1) inch plate or equivalent and/or using eighty (80) tons or less of welding consumables.

(e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(f) Paved and unpaved roads and parking lots with public access.

(g) Other activities not previously identified (by category) with emissions equal to or less than Insignificant Activity thresholds: drilling holes, saw cutting, grinding, and punching metal beams and plates.

Unpermitted Emission Units and Pollution Control Equipment

There have been no unpermitted emission units constructed and/or operated without a permit at the source since the last approval.

Emission Units and Pollution Control Equipment Removed From the Source

There have been no emission units or pollution control equipment removed from the source since the last approval.

Existing Approvals

Since the issuance of the FESOP (F097-17400-00135) on May 17, 2004, the source has constructed or has been operating under the following approvals as well:

(a) Significant Permit Revision No. SPR097-21739-00135, issued on June 5, 2007.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been revised in this FESOP Renewal:

(a) During the review of FESOP Renewal F097-17400-00135, issued on May 17, 2004, Geiger and Peters, Inc. requested that the Horizontal Roller Blast Machine, with a baghouse for particulate control, be tested for PM and PM10 **just once**, not every five years. The source had not been required to test this unit before, it accounts for more than 40% of the source-wide potential before control, and unlimited PM10 emissions before control is more than 100 tpy. However, the source was reporting actual PM10 emissions of 0.40 tpy and compliance monitoring conditions for the baghouse were included in the permit. It therefore seemed reasonable to satisfy the source's request to remove the requirement of repeating the test every 5 years.

However, the source conducted a stack test on April 10, 2007 which produced the following results:

	Stack Test Results	Limit
PM	0.0298 gr/dscf	0.03 gr/dscf
PM10	0.025 lb/hr	2.25 lb/hr

The PM10 emission rate is well below the FESOP limit. However, the PM grain loading is very close to the 326 IAC 6.5-1-2(a) limit of 0.03 gr/dscf, at a capacity level less than 100% (the test was performed at 85.6% capacity). Therefore, stack testing will be required on a five year cycle for PM, but not for PM10.

The following changes will be made to condition D.1.4 (Testing Requirements):

~~D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]~~

~~During the period between 30 and 36 months after issuance of FESOP, F097-17400-00135, in order to demonstrate compliance with Condition D.1.1 and Condition D.1.2, the Permittee shall perform PM and PM-10 testing for Emission Unit ID Horizontal Roller Blast Machine utilizing methods as approved by the IDEM Commissioner and OES Administrator. PM-10 includes filterable and condensable particulate matter. Testing shall be conducted in accordance with Condition C.7 - Performance Testing.~~

D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

No later than five (5) years from April 10, 2007, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM testing for Emission Unit ID Horizontal Roller Blast Machine utilizing methods as approved by the IDEM Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

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 11th 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]
PM10	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.

Pollutant	Designation
[1]Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. 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 all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(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.

Unrestricted Potential Emissions

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM10 is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their PM10 emissions to less than Title V levels, therefore the source will be issued a FESOP.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the source has agreed to limit their single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP

(d) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Potential to Emit After Issuance

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

Potential to Emit (tons/year)										
Process / Emission Unit	**PM**	**PM10**	**PM2.5[1]**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAP Single[2]**		**HAP Comb.**
Emission Unit ID Horizontal Roller Blast Machine	176.95	9.87	9.87	0.0	0.0	0.0	0.0	0.0	--	0.0
Emission Unit ID Spray Painting	42.67	42.67	42.67	0.0	42.73	0.0	0.0	< 9.8	Xylene	< 17.3
Insignificant Activities (Natural Gas Combustion)	0.058	0.233	0.233	0.018	0.168	2.572	3.062	0.055	Hexane	0.058
(Kerosene Combustion)	0.007	0.027	0.027	0.002	0.019	0.294	0.350	0.006	Hexane	0.006
(Others)	10.54	10.54	10.54	0.00	0.00	0.00	0.00	0.042	Mn	0.067
Total Emissions	230.22	63.34	63.34	0.02	42.92	2.87	3.41	< 10	--	< 25
Title V Major Source Threshold	N/A	100	N/A	100	100	100	100	10	--	25
PSD and Nonattainment NSR significant level	250	250	100	250	250	250	250	N/A	--	N/A

Note[1]: PM10 and PM2.5 emissions from the Horizontal Roller Blast Machine are limited to 2.25 pounds per hour (lb/hr) or 9.87 tons per year (tpy) per 12 month consecutive month period. This limit is structured such that source-wide PM10 and PM2.5 emissions are limited to less than the major source threshold of 100 tons per year (tpy); the Spray Painting significant emissions of 42.67 tpy plus the total insignificant activities of 10.8 tpy, are included in the calculations [(9.87 + 42.67 + 0.233 +0.027 + 10.54 = 63.34 tpy < 100 tpy)]. Compliance with this FESOP limitation will be determined at the end of each month.

Note[2]: Single HAP emissions from the Spray Painting operations are limited to below 9.8 tpy such that the source-wide single HAP emissions will be less than 10 tpy per 12 month consecutive month period, with compliance determined at the end of each month. Compliance with this FESOP limitation will be determined at the end of each month. In addition, by limiting the single HAP emissions, combined HAPs potential to emit (PTE) levels will stay below the major source-wide threshold of 25 tpy.

Compliance with these FESOP limitations renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 40 CFR Part 63 not applicable.

(a) This existing stationary source is not major for PSD because the emissions of each attainment regulated pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

(b) This existing stationary source is not major for Nonattainment NSR because the emissions of the nonattainment pollutant, PM2.5, are less than one hundred (<100) tons per year each.

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

Federal Rule Applicability

(a) The requirements of the New Source Performance Standards for 40 CFR 60, Subparts EE (Surface Coating of Metal Furniture), MM (Automobile and Light Duty Truck Surface Coating Operations), SS (Industrial Surface Coating: Large Appliances), or TT (Metal Coil Surface Coating), are not included in the permit for this structural metal fabrication operation because this source does not fall under any of those categories. There are no other New Source Performance Standards (NSPS, 326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) This source falls under a category regulated by the MACT standard 40 CFR 63, Subpart MMMM as a source of miscellaneous metal parts and products surface coating operations. This existing source is limited to HAP emissions less ten (10) tons per year of a single HAP and twenty-five (25) tons per year of a combination of HAPs. Therefore, the source is not a major HAP source and is not subject to the requirements of 40 CFR 63, Subpart MMMM (National Emission Standards for Miscellaneous Metal Parts and Products Surface Coating Operations).

State Rule Applicability - Entire Source

326 IAC 1-7 Stack Height Provisions
All sources having exhaust gas stacks through which a potential of twenty-five (25) tons per year or more of particulate matter (PM) are emitted and for which construction commenced after June 19, 1979, shall be constructed using good engineering practice (GEP) stack height. Emission Unit ID Horizontal Roller Blast Machine has uncontrolled potential emissions of PM in excess of 25.0 tons per year (see Appendix A). With the use of a baghouse at an estimated 98% PM control efficiency, actual emissions at maximum capacity and 8,760 hours of operation are less than 25.0 tons per year. 326 IAC 1-7-5 specifically exempts sources from the GEP stack height requirement if actual emissions (after controls) are less than 25 tons per year. Therefore, requirements of 326 IAC 1-7 shall not apply.

326 IAC 2-1.1-5 (Non-attainment New Source Review)
This source is not major source under nonattainment NSR because it has chosen to limit their PM2.5 emissions to less than 100 tons per year. Therefore, the Non-attainment New Source Review requirements are not applicable, and are not included in this permit. See limits pursuant to 326 IAC 2-8 (FESOP) below.

326 IAC 2-2 (Prevention of Significant Deterioration)
The requirements of 326 IAC 2-2 do not apply to this source because the potential to emit before controls of criteria pollutants are less than the threshold levels for applicability of the rule (i.e. 250 tons per year). The source was constructed in 1905 with modifications in 1989 and 2007 and is not one of 28 listed source categories under 326 IAC 2-2.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The Spray Painting operation utilizing three (3) airless spray painting guns, identified as EU ID Spray Painting, is not a major source of HAP; therefore, rule 326 IAC 2-4.1-1 does not apply. (See FESOP limits below).

326 IAC 2-6 (Emission Reporting)
This source is located in Marion County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8 (Federally Enforceable State Operating Permit Program (FESOP))
Pursuant to 326 IAC 2-8-4:

(a) The PM10 emissions from the Horizontal Roller Blast Machine, identified as Emission Unit ID Horizontal Roller Blast Machine, shall not exceed 2.25 pounds per hour (lb/hr).

(b) The PM2.5 emissions from the Horizontal Roller Blast Machine, identified as Emission Unit ID Horizontal Roller Blast Machine, shall not exceed 2.25 pounds per hour (lb/hr).

(c) The individual HAP usage for the Graco Spray Painting Operation, identified as Emission Unit ID Spray Painting shall be limited to 9.8 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(d) The combined HAP usage for the Graco Spray Painting Operation, identified as Emission Unit ID Spray Painting shall be limited to 17.3 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with these emission limits, combined with the potential emissions from all other units at this source will limit the source-wide potential to emit of PM10, and PM2.5 to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 2-1.1-5 (Nonattainment NSR) are not applicable.

Compliance with these emission limits, combined with the potential emissions from all other units at this source will also limit single HAP to less than 10 tons per twelve (12) consecutive month period and combination HAPs to less than 25 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permit Program), 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants), and 40 CFR 63 are not applicable.

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 Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

State Rule Applicability – Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The operation of Emission Unit listed as ID Spray Painting will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6.5 (Particulate Matter Limitations)
This source is not specifically listed in sections 6.5-1-6 (Marion County). This source has the potential to emit one hundred (100) tons or more and actual emissions of ten (10) tons or more of particulate matter per year. Pursuant to this rule, particulate matter emissions from the Emission Units listed as ID Horizontal Roller Blast Machine and ID Spray Painting shall not exceed 0.03 grains per dry standard cubic foot (gr/dcsf).

326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes)
The limitations pursuant to 326 IAC 6.5-1 are more stringent than 326 IAC 6-3-1. Therefore, this regulation is not included in the permit.

326 IAC 8-2-9 (Miscellaneous Metal Coating)
This source has an SIC of 3441 and conducts surface coating on miscellaneous metal parts in Marion County. 326 IAC 8-2-9 is an applicable requirement because actual VOC emissions exceed fifteen (15) pounds per day. Pursuant to 326 IAC 8-2-9, the volatile organic compound (VOC) content of coating(s) applied in Emission Unit ID Spray Painting shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried or forced warm air dried coatings up to 194 degrees Fahrenheit. The facility is not presently equipped with a drying oven or drying equipment and all coatings are air dried.

Based on the permit applications, VOC content in the coatings applied in Emission Unit ID Spray Painting, is no greater than 3.02 lbs/gal (see Appendix A). Therefore, the emission unit will be able to be in compliance with this requirement.

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.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

The compliance determination requirements applicable to this source are as follows:

(a) The Emission Unit ID Horizontal Roller Blast Machine, equipped with one (1) reverse flow baghouse for particulate matter control, identified as Control Equipment ID CE #1 has applicable compliance determination conditions as specified below:

The baghouse, identified as Control Equipment ID CE #1, shall be in operation at all times when Emission Unit Horizontal Roller Blast Machine is in operation.

Emission Unit	Control Device	Pollutant	Frequency of Testing	Limit or Requirement
Horizontal Roller Blast Machine	Reverse Flow Baghouse	PM	Once every five years	0.03 g/dscf
Horizontal Roller Blast Machine	Reverse Flow Baghouse	PM10* & PM2.5	One time test requirement satisfied on 4/10/07	2.25 b/hr

* PM10 is equal to PM2.5

(b) Compliance with the VOC content and usage limitations pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

The compliance monitoring requirements applicable to this source are as follows:

Control	Parameter	Frequency	Range	Excursions and Exceedances
Control Equipment ID CE #1 (baghouse)	Water Pressure Drop	Daily	1 to 6 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

Should overspray emissions from Emission Unit ID Spray Painting be directed to the outside air:

(a) Weekly observations shall be made of the overspray originating from the surface coating area while one or more of the paint guns are in operation. If a condition exists which would result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.

(b) Monthly inspections shall be performed of the coating emissions from the surface coating area and the presence of overspray on the nearby ground outside of this designated surface coating area. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances.

These monitoring conditions are necessary because the baghouse for the Emission Unit ID Horizontal Roller Blast Machine must operate properly, and Emission Unit ID Spray Painting must operate properly, to ensure compliance with 326 IAC 6.5 (Particulate Matter Limitations), 326 IAC 2-1.1-5 (Non-attainment New Source Review) and 326 IAC 2-8 (FESOP).

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal, F097-26845-00135, be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on August 6, 2008.

Conclusion

The operation of this structural metal fabrication operation shall be subject to the conditions of the attached FESOP Renewal No. F097-26845-00135.

Appendix A: Emission Calculations
Coatings

Company Name: Geiger & Peters, Inc.
Address City IN Zip: 761 South Sherman Drive, Indianapolis, Indiana 46203
Permit #: F 097-26845-00135
Permit Reviewer: Linda Quigley/EVP

Coatings Properties

Hydro zinc 91-H2O

As per the MSDS provided by the manufacturer (Tnemec), the Hydro-Zinc 91-H20 has an unthinned VOC content of 2.67 lbs/gallon.
As per the MSDS provided by the manufacturer (Tnemec), the Hydro-Zinc 91-H20 has an unthinned solids content of 63%.
As per the MSDS provided by the manufacturer (Tnemec), the Hydro-Zinc 91-H20 weighs 23.94 lbs per gallons as applied.
As applied:
2.67 pounds of VOC per gallon
To calculate the HAP content of Hydro Zinc 91-H20 a mass balance is performed using the HAP content of the two component mixture

F091-0H20A		F091-0H20B	
9.1213	lbs/gal	58.7993	lbs/gal

Mixed in a 3:1 ratio
Part A contains:
Ethyl benzene
8.22% weight percent of part A
Xylene
32.91% weight percent of part A
As applied:
Ethyl benzene = (% Ethyl benzene of part A x 9.1213 lb/gal) * 2.8 gallons of part A makes 4 gallons as applied
= **0.52** lbs of ethyl benzene / gallon
Xylene = (% Xylene of part A x 9.1213 lb/gal) * 2.8 gallons of part A makes 4 gallons as applied
= **2.10** lbs of xylene / gallon
PTE PM Emissions: (80% transfer efficiency)

23.94	lbs/gal
63%	solids
15.0822	lbs of solids / gallon
4.52466	lbs PM / hour
19.8180108	tons PM / year

Tneme-Zinc 90-97

As per the MSDS provided by the manufacturer (Tnemec), the Tneme-Zinc 90-97 has an unthinned VOC content of 2.67 lbs/gallon.
As per the MSDS provided by the manufacturer (Tnemec), the Tneme-Zinc 90-97 has an unthinned solids content of 63%.

As per the MSDS provided by the manufacturer (Tnemec), the Tneme-Zinc 90-97 weighs 23.94 lbs per gallon.

As applied:
2.67 pounds of VOC per gallon
To calculate the HAP content of Tneme Zinc 90-97 a mass balance is performed using the HAP content of the two component mixture

F090-0097A		F090-0097B	
8.9615	lbs/gal	58.7993	lbs/gal
3.793	lbs VOC per gal	0	lbs VOC per gal
42.328	% VOC by weight	0	% VOC by weight

Mixed in a 3:1 ratio
Part A contains:
Ethyl benzene
8.45% weight percent of part A
Xylene
33.84% weight percent of part A
As applied:

Ethyl benzene = (% Ethyl benzene of part A x 8.9615 lb/gal) * 2.8 gallons of part makes 4 gallons as applied
= **0.53** lbs of ethyl benzene / gallon
Xylene = (% Xylene of part A x 8.9615 lb/gal) * 2.8 gallons of part A makes 4 gallons as applied
= **2.12** lbs of xylene / gallon
PTE PM emissions: (80% transfer efficiency)
23.94 lbs/gallon
63% solids
15.0822 lbs of solids / gallon
4.52466 lbs PM / hour
19.8180108 tons PM / year

F.C. Typoxy
As per the MSDS provided by the manufacturer (Tnemec), the F.C. Typoxy has an unthinned VOC content of 3.02 lbs/gallon.
As applied:
3.02 pounds of VOC per gallon
To calculate the HAP content of F.C. Typoxy a mass balance is performed using the HAP content of the two component mixture

F027-11WHA
14.5885 lbs/gal

F027-0027B
12.7603 lbs/gal

Mixed in a 1:1 ratio

Part A contains:
Xylene
14.35% weight percent of part A

Part B contains:
Ethyl benzene
3.23% weight percent of part B
Xylene
20.04% weight percent of part B

As applied:
Ethyl benzene = (% Ethyl benzene of part B x 12.7603 lb/gal) * 1 parts B / 2 total parts
= **0.21** lbs of ethyl benzene / gallon
Xylene = [(% Xylene of part A x 14.5885 lb/gal) x 1 part A + (% Ethyl benzene of part B x 12.7603 lb/gal) x 1 part B] / 2 total parts
= **2.33** lbs of xylene / gallon
PTE PM emissions: (80% transfer efficiency)
13.71 lbs/gallon
58% solids
7.9518 lbs of solids / gallon
2.38554 lbs PM / hour
10.4486652 tons PM / year

Appendix A: Emission Calculations
Surface Coating

Company Name: Geiger & Peters, Inc.
Address City IN Zip: 761 South Sherman Drive, Indianapolis, Indiana 46203
Permit #: 097-26845-00135
Permit Reviewer: Linda Quigley/EVP

Spray Painting PTE (as supplied)
Max capacity stated as:
1 gallon per unit (ton)
3.23 units (tons) / hr
80 % Transfer Efficiency

Potential VOC Emissions (worst case)

Coating	lbs volatile/gal coat	lbs / hr VOC PTE and actual	tons / yr VOC PTE	Actual tons / yr VOC
Hydro zinc	2.67	8.62	37.77	10.76
Tneme-Zinc	2.67	8.62	37.77	10.76
F.C. Typoxy	3.02	9.75	**42.73**	12.17

PM/PM10/PM2.5 Emissions

Coating	lbs solid / gal coat	lb / hr PM PTE and actual	tons / yr PM PTE	Actual tons / yr PM
Hydro zinc	15.08	9.743	**42.675**	12.159
Tneme-Zinc	15.08	9.743	42.675	12.159
F.C. Typoxy	7.95	5.137	22.499	6.411

Potential HAP Emissions (worst case)

Coating	Maximum Usage	Ethyl benzene	Xylene	lbs /hr Ethyl benzene	lbs / hr Xylene	lbs / hr combined HAPs	tons / yr Ethyl benzene PTE	tons / yr Xylene PTE	tons / yr combined HAPs
	gal/yr	lbs / gallon	lbs / gallon						
Hydro zinc	28,295	0.52	2.10	1.70	6.79	8.48	7.43	29.73	37.15
Tneme-Zinc	28,295	0.53	2.12	1.71	6.86	8.57	**7.50**	30.03	**37.53**
F.C. Typoxy	28,295	0.21	2.33	0.67	7.51	8.18	2.92	**32.90**	35.81

Note:
Painting is conducted for one shift per day, six days per week.
The coating systems are used unthinned, i.e. no thinner or solvent is added to the coating.

Limited HAP (worst case - Xylene) Emissions:

					Emissions at limited coatings usage, ton/yr		
	Limited Xylene Emission, less than ton/yr	**Xylene Content, lb/gal**	**Limited usage, less than, gal/yr**	**Equivalency to F.C. Typoxy, gal/gal**	**VOC Emissions, less than**	**Combined HAP Emissions, less than**	**PM/PM10/PM 2.5**
Hydro zinc	9.8	2.10	**9,328**	**0.904**	**12.5**	**12.498**	**14.1**
Tneme-Zinc	9.8	2.12	**9,233**	**0.913**	**12.3**	**12.497**	**13.9**
F.C. Typoxy	9.8	2.33	**8,429**	**1.000**	**12.7**	**10.886**	**6.7**

Appendix A: Emission Calculations
Abrasive Blasting - Horizontal Roller Blast Machine

Company Name: Geiger & Peters, Inc.
Address City IN Zip: 761 South Sherman Drive, Indianapolis, Indiana 46203
Permit #: F 097-26845-00135
Permit Reviewer: Linda Quigley/EVP

Table 1 - Emission Factors for Abrasives

	Emission Factor	
Abrasive	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

	Nozzle Pressure (psig)							
Internal diameter, in	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	1,170	1,336	1510	1680	1850	2030
3/4	1140	1420	1,670	1,915	2160	2400	2630	2880
1	2030	2460	2,900	3,340	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 =	NA
D = Density of abrasive (lb/ft3) From Table 2 =	NA
D1 = Density of sand (lb/ft3) =	NA
ID = Actual nozzle internal diameter (in) =	NA
ID1 = Nozzle internal diameter (in) from Table 3 =	NA

Flow Rate (FR) (lb/hr) = 3900.0 * per nozzle

Uncontrolled Emissions (E, lb/hr)

EF = emission factor (lb PM/ lb abrasive) From Application of 3/16/98 * =	0.01036
FR = Flow Rate (lb/hr) From Application of 3/16/98 *=	3900.000
w = fraction of time of wet blasting =	0 %
N = number of nozzles =	1
EF = emission factor (lb PM 10/ lb abrasive) From Table 1 for Grit =	0.70000

Uncontrolled PM Emissions =	**40.4 lb/hr**
	176.95 ton/yr

Uncontrolled PM 10 / PM2.5 Emissions =	**28.3 lb/hr**
	123.87 ton/yr

Estimated Actual Emissions based on 8 hr/day, 6 days/week

Uncontrolled actual PM Emissions =	**40.4 lb/hr**
	50.42 ton/yr

Estimated Actual Emissions based on 98% baghouse efficiency & 8760 hr

Controlled PM Emissions =	**0.8 lb/hr**	**0.011**	**gr/dscf**
	3.54 ton/yr		

METHODOLOGY
Emission Factors from Stappa Alapco, Section 3 "Abrasive Blasting"

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)

@ 0.03gr/dscf & 8780 acfm

Controlled PM10 / PM2.5 Emissions =	**0.6 lb/hr**	**2.25 lb/hr**
	2.48 ton/yr	**9.87 tons/yr**

* denotes source supplied the flow rate of steel shot/grit in the application received 3/16/98. Source also reported inlet dust concentration of 4714 grains/min.
4714 grains/min * lb/7000 grains x 60 min/hr = 40.4 lbs/hr of emissions uncontrolled.
40.4 lbs/hr / 3900 lbs shot cycled/hr = 0.01036 lbs PM emissions per pound of shot which is in line with Table 1 data.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Insignificant Activities - Small Industrial Heater

Company Name: Geiger & Peters, Inc.
Address City IN Zip: 761 South Sherman Drive, Indianapolis, Indiana 46203
Permit #: F 097-26845-00135
Permit Reviewer: Linda Quigley/EVP

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
7.0	61.2

	Pollutant					
	PM*	PM10* (PM2.5)	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	**0.058**	**0.233**	**0.018**	**3.062**	**0.168**	**2.572**

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Hazardous Air Pollutants (HAPs) Emissions

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	**0.0001**	**0.0000**	**0.0023**	**0.0551**	**0.0001**

Single HAP
Hexane
0.0551

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0001**

Combined HAP total
0.0578

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
Kerosene Combustion Only
MM BTU/HR <100
Insignificant Activities - Small Industrial Heaters

Company Name: Geiger & Peters, Inc.
Address City IN Zip: 761 South Sherman Drive, Indianapolis, Indiana 46203
Permit #: F 097-26845-00135
Permit Reviewer: Linda Quigley/EVP

Mobile Kerosene Heaters, natural gas fired

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
0.8	7.0

	Pollutant					
	PM*	PM10* (PM2.5)	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	**0.007**	**0.027**	**0.002**	**0.350**	**0.019**	**0.294**

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Hazardous Air Pollutants (HAPs) Emissions

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	0.0000	0.0000	0.0003	**0.0063**	0.0000

Single HAP
Hexane
0.0063

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	0.0000	0.0000	0.0000	0.0000	0.0000

Combined HAP total
0.0066

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

Methodology

All emission factors are based on normal firing.
Kerosene Heating value = 135,000 BTU / gallon of kerosene burned
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factor for Kerosene is from AP 42, Appendix A, and AP-42 FIRE as lb per 1,000 gallons of kerosene
Emission (tons/yr) = Throughput (1 MMCF / 1,020 MMBtu) * (7.60 lb/MMCFT) * (8,760 hours/year) x Emission Factor (lb/1,000 gallons) * (1,000,000 BTU/MMBTU)*1 ton/2,000 lbs)

Appendix A: Emissions Calculations

Insignificant Other Activities - Welding, Cutting, Drilling, etc.

Company Name: Geiger & Peters, Inc.
Address City IN Zip: 761 South Sherman Drive, Indianapolis, Indiana 46203
Permit Number: F 097-26845-00135
Reviewer: Linda Quigley/EVP

PROCESS	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/lb consumed)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Drilling, metal	2	2	0.5	0.0039	neg	neg	neg	0.0005	neg	neg	neg	neg
Punching, metal	1	2	5	0.0039	neg	neg	neg	0.0023	neg	neg	neg	neg
Grinding, metal	24	2	5	0.0039	neg	neg	neg	0.0562	neg	neg	neg	neg
Sawing, metal	3	2	5	0.0039	neg	neg	neg	0.0070	neg	neg	neg	neg

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Submerged Arc	0	0		0.0360	0.0110			0.0000	0.0000	0.0000	0.0000	0.0000
GMAW	27	0.3		0.0055	0.0005			0.0446	0.0041	0.0000	0.0000	0.0041
Stick (E7018 electrode)	0	0		0.0211	0.0009			0.0000	0.0000	0.0000	0.0000	0.0000
Tungsten Inert Gas (TIG)(carbon	0	0		0.0055	0.0005			0.0000	0.0000	0.0000	0.0000	0.0000
Oxyacetylene(carbon steel)	0	0		0.0055	0.0005			0.0000	0.0000	0.0000	0.0000	0.0000

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)
FLAME CUTTING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	0	0	0	0.1622	0.0005	0.0001	0.0003	0.0000	0.0000	0.0000	0.0000	0.0000
Oxymethane	26	1.0	18	0.0815	0.0002		0.0002	2.2885	0.0056	0.0000	0.0056	0.0112
Plasma**	1	1.0	30	0.0039				0.0070	0.0000	0.0000	0.0000	0.0000
EMISSION TOTALS												
Potential Emissions lbs/hr								2.4061	0.0097	0.0000	0.0056	0.0153
Potential Emissions lbs/day								57.7459	0.2320	0.0000	0.1348	0.3668
Potential Emissions tons/year								10.5386	0.0423	0.0000	0.0246	0.0669

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
** No AP-42 emission factor available for plasma cutting. Emission Factor for plasma cutting is 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 calculting 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" thick)
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used).
All PM10 is assumed to = PM2.5

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 lbs.

Appendix A: Emission Calculations
Emissions Summary

Company Name: Geiger & Peters, Inc.
Address City IN Zip: 761 South Sherman Drive, Indianapolis, Indiana 46203
Permit #: F 097-26845-00135
Permit Reviewer: Linda Quigley/EVP

Unrestricted Potential to Emit

	PM		PM10 / PM2.5		VOC		Highest Single HAP			Combined HAP		SO2	NOx	CO
	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day		tons/yr	lbs/day	tons/yr	tons/yr	tons/yr	tons/yr
Horizontal Roller Blast Machine	**969.60**	**176.95**	**678.72**	**123.87**	**0.0000**	**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	0.0000	0.0000	0.0000
Spray Painting Operation	**233.8**	**42.67**	**233.8**	**42.67**	**108.7**	**42.73**	**83.7**	**Xylene**	**32.9**	**205.7**	**37.5**	0.0000	0.0000	0.0000
Insignificant Activities														
Natural Gas	**0.319**	0.058	**1.275**	0.233	0.923	**0.168**	**0.302**	**Hexane**	**0.055**	**0.317**	**0.058**	0.0184	3.0616	2.5718
Kerosene	0.036	**0.007**	**0.146**	0.027	0.106	**0.019**	**0.035**	**Hexane**	**0.006**	**0.035**	**0.006**	0.0021	0.3504	0.2943
Others	**57.7**	**10.54**	**57.7**	**10.54**			**0.232**	**Magnesium**	**0.042**	**0.367**	**0.067**	0.0000	0.0000	0.0000
Total:	1261.5	**230.2**	971.7	**177.3**	109.7	**42.91**	84.3	Total single	**32.9**	206.4	**37.7**	0.020	3.412	2.866

326 IAC 6.5-1-2 (Nonattainment Area Particulate Limitations)

	Air Flow,	Grainload.,	Limited PM/PM10 Emissions	
Horizontal Roller	dscfm	gr/dscf	lb/hr	ton/yr
Blast Machine	8,780	**0.03**	2.258	**9.889**

Limited Potential to Emit (326 IAC 2-8)

	PM		PM10 / PM2.5		VOC		Highest Any Single HAP			Combined HAP		SO2	NOx	CO
	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day	tons/yr	lbs/day		tons/yr	lbs/day	tons/yr	tons/yr	tons/yr	tons/yr
Horizontal Roller Blast Machine lb/hr	969.6	**176.95**	412.8	**9.87**	0.000	0.000	**0.000**		**0.000**	**0.000**	**0.000**	0.000	0.000	0.000
Spray Painting Operation	233.8	**42.67**	233.8	**42.67**	234.1	42.73	**53.7**	**Xylene <**	**9.8**	**94.8**	**< 17.3**	0.000	0.000	0.000
Insignificant Activities:														
1) Nat. Gas Combustion	**0.319**	**0.058**	1.275	0.233	**0.923**	**0.168**	**0.302**	**Hexane**	**0.055**	**0.317**	**0.058**	0.0184	3.0616	2.5718
2) Kerosene Combustion	0.036	**0.007**	0.146	0.027	0.106	**0.019**	**0.035**	**Hexane**	**0.006**	**0.035**	**0.006**	0.0021	0.3504	0.2943
3) Others	**57.7**	**10.54**	**57.7**	**10.54**	0.000	**0.000**	**0.232**	**Magnesium**	**0.042**	**0.367**	**0.067**	0.000	0.000	0.000
Total:	1261.5	**230.23**	705.8	**63.34**	235.1	**42.91**	54.3	**<**	**10.0**	95.5	**< 25.0**	0.020	3.412	2.866