



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: June 3, 2009

RE: CAPCO LLC / 005-27721-00100

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

## Notice of Decision: Approval - Registration

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

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

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

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

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

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

Enclosures  
FN-REGIS.dot 1/2/08



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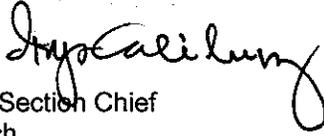
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**REGISTRATION  
OFFICE OF AIR QUALITY**

**CAPCO, LLC  
1349 Arcadia Drive  
Columbus, Indiana 47201**

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. R005-27721-00100	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date:  June 3, 2009

## SECTION A

## SOURCE SUMMARY

This registration 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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

### A.1 General Information

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The Registrant owns and operates an automotive metal stamping parts manufacturer.

Source Address:	1349 Arcadia Drive, Indiana 47201
Mailing Address:	1349 Arcadia Drive, IN 47201
General Source Phone Number:	(812) 375-1700
SIC Code:	3469
County Location:	Bartholomew County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

### A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) Solvent Cleaning Machine, identified as EU-1, installed in July 2001, with a maximum capacity of five (5) gallons per day, using no control equipment, and exhausting to stack S1.
- (b) One (1) Electrodeposition coating operation, identified as EU-2, approved for construction in 2009, coating metal parts for automotive industry, with a maximum capacity of 5.5 gallons per hour, using no control equipment, and exhausting indoors.
- (c) One (1) surface coating booth, identified as EU-3, used to coat metal parts for the automotive industry, with a maximum rate of 50 parts for hour, uses one (1) high volume low pressure (HVLP) spray applicator. Particulate emissions are controlled using a dry filter, which exhausts internally. The booth was approved for construction in 2009.

## SECTION B

## GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-1.1-1]

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Terms in this registration 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 2-1.1-1) shall prevail.

### B.2 Effective Date of Registration [IC 13-15-5-3]

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Pursuant to IC 13-15-5-3, this registration 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.

### B.3 Registration Revocation [326 IAC 2-1.1-9]

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Pursuant to 326 IAC 2-1.1-9 (Revocation), this registration to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

### B.4 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

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Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, IN 46204-2251
- (c) The notification 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.

### B.5 Source Modification Requirement [326 IAC 2-5.5-6(a)]

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Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

**B.6 Registrations [326 IAC 2-5.1-2(i)]**

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Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

#### C.1 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 registration:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (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.2 Fugitive Dust Emissions [326 IAC 6-4]

The Registrant 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).

## SECTION D.1

## OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) One Solvent Cleaning Machine, identified as EU-1, installed in July 2001, with a maximum capacity of five (5) gallons per day, using no control equipment, and exhausting to stack S1.

(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 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-4]

Pursuant to 326 IAC 8-3-4 (Conveyorized Degreaser Operation), for conveyorized degreasing operations constructed after January 1, 1980, the Permittee shall:

- (a) Minimize carryout emissions by:
- (1) Racking parts for best drainage;
  - (2) Maintaining the vertical conveyor speed at less than 3.3 meters per minute (eleven (11) feet per minute);
- (b) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (c) Repair solvent leaks immediately, or shut down the degreaser;
- (d) Not use workplace fans near the degreaser opening;
- (e) Not allow water in solvent exiting the water separator; and
- (f) Provide a permanent, conspicuous label summarizing the operating requirements.

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-7]

Pursuant to 326 IAC 8-3-7(a) (Conveyorized Degreaser Operation and Control), for conveyorized degreasing operations with an air to solvent interface of twenty-one and six-tenths (21.6) square feet or greater, constructed after July 1, 1990:

- (a) The Permittee shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser's entrances and exits with downtime covers which are closed when the degreaser is not operating.
  - (2) Equip the degreaser with the following switches:
    - (A) A condenser flow switch and thermostat which shuts off sump heat if condenser coolant stops circulating or becomes too warm.
    - (B) A spray safety switch which shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).
    - (C) A vapor level control thermostat which shuts off sump heat when vapor

level rises more than ten (10) centimeters (four (4) inches).

- (3) Equip the degreaser with entrances and exits which silhouette workloads in such a manner that the average clearance between the articles and the degreaser opening is either less than ten (10) centimeters (four (4) inches) or less than ten percent (10%) of the width of the opening.
- (4) Equip the degreaser with a drying tunnel, rotating or tumbling basket, or other equipment which prevents cleaned articles from carrying out solvent liquid or vapor.
- (5) Equip the degreaser with a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (6) Equip the degreaser with one (1) of the following control devices:
  - (A) A refrigerated chiller;
  - (B) A carbon adsorption system with ventilation which, with the downtime covers open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air to solvent interface area, and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle; or
  - (C) Other systems of demonstrated equivalent or better control as those outlined in clause (A) or (B). Such systems shall be submitted to the U.S. EPA as a SIP revision.

## SECTION D.2

## OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (b) Electrodeposition coating operation, identified as EU-2, approved for construction in 2009, coating metal parts for automotive industry, with a maximum capacity of 5.5 gallons per hour, using no control equipment, and exhausting indoors.
- (c) One (1) surface coating booth, identified as EU-3, used to coat metal parts for the automotive industry, with a maximum rate of 50 parts per hour, uses one (1) high volume low pressure (HVLP) spray applicator. Particulate emissions are controlled using a dry filter, which exhausts internally. The booth was approved for construction in 2009..

(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 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

#### D.2.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9(d)(4), the Permittee shall not allow the discharge into the atmosphere VOC in excess of three (3) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

### Compliance Determination Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

#### D.2.2 Volatile Organic Compounds (VOC)[326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content 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.

### Record Keeping and Reporting Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

#### D.2.3 Record Keeping Requirements

- (a) To document compliance with condition D.2.1, the Permittee shall maintain records in accordance with (1) below. Records maintained for (1) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC content limit established in condition D.2.1.
  - (1) The VOC content of each coating material and solvent used less water.
- (b) 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  
COMPLIANCE AND ENFORCEMENT BRANCH**

**REGISTRATION  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

<b>Company Name:</b>	CAPCO,LLC
<b>Address:</b>	1349 Arcadia Drive
<b>City:</b>	Columbus, Indiana 47201
<b>Phone Number:</b>	(812) 375-1700
<b>Registration No.:</b>	R005-27721-00100

I hereby certify that CAPCO,LLC is :

- still in operation.
- no longer in operation.
- in compliance with the requirements of Registration No. R005-27721-00100.
- not in compliance with the requirements of Registration No. R005-27721-00100.

I hereby certify that CAPCO,LLC is :

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Phone Number:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Registration

#### Source Description and Location

**Source Name:** CAPCO, LLC  
**Source Location:** 1349 Arcadia Drive, Columbus, Indiana 47201  
**County:** Bartholomew  
**SIC Code:** 3469  
**Registration (or Exemption) No.:** R005-27721-00100  
**Permit Reviewer:** Bruce Farrar

On April 2, 2009, the Office of Air Quality (OAQ) received an application from CAPCO, LLC related to the construction and operation of new emission units and the continued operation of an existing plant.

#### Existing Approvals

There have been no previous approvals issued to this source.

#### County Attainment Status

The source is located in Bartholomew County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.

<sup>1</sup>Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.  
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(a) Ozone Standards

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. Bartholomew 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

Bartholomew County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15<sup>th</sup>, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements.

The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

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

#### **Fugitive Emissions**

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

#### **Background and Description of Emission Units and Pollution Control Equipment**

The Office of Air Quality (OAQ) has reviewed an application, submitted by CAPCO, LLC on April 3, 2009 relating to stamped metal parts for automotive industry. CAPCO, LLC has one (1) existing emission unit and is adding one (1) new electrodeposition coating operation. This coating operation will increase total VOC emissions above ten (10) tons per year and require the source to have a Registration.

The following is a list of the new emission unit:

- (a) One Solvent Cleaning Machine, identified as EU-1, installed in July 2001, with a maximum capacity of five (5) gallons per day, using no control equipment, and exhausting to stack S1.
- (b) Electrodeposition coating operation, identified as EU-2, approved for construction in 2009, coating metal parts for automotive industry, with a maximum capacity of 5.5 gallons per hour, using no control equipment, and exhausting indoors.
- (c) One (1) surface coating booth, identified as EU-3, used to coat metal parts for the automotive industry, with a maximum rate of 50 parts per hour, uses one (1) high volume low pressure (HVLP) spray applicator. Particulate emissions are controlled using a dry filter, which exhausts internally. The booth was approved for construction in 2009.

#### **Enforcement Issues**

There are no pending enforcement actions related to this source.

#### **Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

#### **Permit Level Determination – Registration**

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

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10 *	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Solvent Cleaning Machine (EU-1)	-	-	-	-	-	9.29	-		
Electrodeposition Coating Line (EU-2)	-	-	-	-	-	4.87	-		
Surface Booth (EU-3)	0.49	0.49	0.49	-	-	2.26	-	1.01	0.51
Natural Gas Combustion	0.045	0.18	0.18	0.014	2.41	0.13	2.02	0.05	0.04
<b>Total PTE of Entire Source</b>	<b>0.54</b>	<b>0.67</b>	<b>0.67</b>	<b>0.014</b>	<b>2.41</b>	<b>16.55</b>	<b>2.02</b>	<b>1.06</b>	
Exemptions Levels	5	5	5	10	10	5 or 10	25	25	10
Registration Levels	25	25	25	25	25	25	100	25	10
* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

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

**Federal Rule Applicability Determination**

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (326 IAC 20-6), are not included in the permit, since this source does not use any of the listed HAPs identified in Subpart T.
- (c) This source is not subject to the National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations (40 CFR Part 63, Subpart HHHHHH). Because the source does not use a chemical strippers that contains methylene chloride and the source does not spray coat motor vehicle and mobile equipment.

- (d) This source is not subject to the National Emission Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories (40 CFR Part 63, Subpart XXXXXX). Because the source is not primarily engaged in any of the nine source categories.
- (e) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability Determination</b>
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The following state rules are applicable to the source:

- (a) 326 IAC 2-5.1-2 (Registrations)  
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have

potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

- (h) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)  
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, because the emission units are otherwise regulated by another Article 8 rule.

#### Solvent Cleaning Operation

- (i) 326 IAC 8-3-4 Volatile Organic Compounds (VOC)  
The Solvent Cleaning Machine, identified as EU-1 that was constructed after the January 1, 1980 applicability date for conveyORIZED degreasing operations, is subject to this rule. The owner or operator of conveyORIZED degreasing operations shall ensure that the following control equipment requirements are met:
- (1) Minimize carryout emissions by:
    - (A) Racking parts for best drainage;
    - (B) Maintaining the vertical conveyor speed at less than 3.3 meters per minute (eleven (11) feet per minute);
  - (2) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
  - (3) Repair solvent leaks immediately, or shut down the degreaser;
  - (4) Not use workplace fans near the degreaser opening;
  - (5) Not allow water in solvent exiting the water separator; and
  - (6) Provide a permanent, conspicuous label summarizing the operating requirements.
- (j) 326 IAC 8-3-7 Volatile Organic Compounds (VOC)  
The Solvent Cleaning Machine, identified as EU-1, is not subject to this rule, because the air to solvent ration is 13.98 square feet.

#### Electrodeposition Surface Coating Operations

- (k) 326 IAC 8-2-9 Volatile Organic Compound (VOC)  
The Electrodeposition, identified as EU-2, applies a coating on metal surface and was constructed after July 1, 1990 and has actual emissions greater than 15 lbs/day, therefore 326 IAC 8-2-9 applies to this unit.
- (1) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the owner or operator shall not allow the discharge into the atmosphere volatile organic compound (VOC) from application equipment of the Electrodeposition coating in excess of 3.0 of VOC per gallon of coating, excluding water, as delivered to the applicator.
  - (2) The Electrodeposition coating operation, identified as EU-2, complies with this rule by using compliant coatings.

#### Surface Coating Operation

- (l) 326 IAC 8-2 (Surface Coating Emission Limitations)  
The surface coating operation is not subject to the requirements of 326 IAC 8-2, because the paint booth operation does not have potential emissions of greater than fifteen (15) pounds of VOC per day before add on controls.

### Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 2, 2009.

The construction and operation of this source shall be subject to the conditions of the attached proposed Registration No. R005-27721-00100. The staff recommends to the Commissioner that this Registration be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Bruce Farrar at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

## Appendix A: Emission Calculations

### Summary

**Company Name: CAPCO, LLC**  
**Address City IN Zip: 1349 Arcadia Drive, Columbus, IN 47201**  
**Permit Number: R005-2771-00100**  
**Pit ID: 005-00100**  
**Reviewer: Bruce Farrar**  
**Date: May 29, 2009**

Emission Unit	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Single HAP	Combine HAPS
Solvent Cleaning (EU-1)	-	-	-	-	-	9.29	-	-	-
Electrodeposition Coating (EU-2)	-	-	-	-	-	4.87	-	-	-
Surface Coating (EU-3)	0.49	0.49	0.49	-	-	0.38	-	0.51	1.01
Natural Gas Combustion	0.05	0.18	0.18	0.01	2.41	0.13	2.02	0.04	0.05
<b>Total</b>	<b>0.54</b>	<b>0.67</b>	<b>0.67</b>	<b>0.01</b>	<b>2.41</b>	<b>14.67</b>	<b>2.02</b>	<b>-</b>	<b>1.06</b>

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Solvent Cleaning Operations**

**Company Name:** CAPCO, LLC  
**Address City IN Zip:** 1349 Arcadia Drive, Columbus, IN 47201  
**Permit Number:** R005-2771-00100  
**Pit ID:** 005-00100  
**Reviewer:** Bruce Farrar  
**Date:** April 2, 2009

Material	Density (Lb/Gal)	VOC Content (wt%)	Solvent Consumption at 4,000 (gal/yr)	Unlimited PTE Solvent Consumption (gal/yr)	Limited PTE (tons/yr)	Unlimited PTE (tons/year)
Actrel 3360L	6.43	100.00%	1320.00	2890.80	4.24	9.29

**Methodology:**

Limited VOC = (Density lbs/gal)\*(VOC content Wt%)\*(1320 gal/4000 hours per year)\*(1/2000 tons/lbs)

Unlimited VOC = (Density lbs/gal)\*(VOC content Wt%)\*(1320 gal/4000 hours per year)\* 8760 hours per year\*(1/2000 tons/lbs)



**Appendix A: Emissions Calculations  
VOC and Particulate  
From Paint Booth EU-3**

**Company Name:** CAPCO, LLC  
**Address City IN Zip:** 1349 Arcadia Drive, Columbus, IN 47201  
**Permit Number:** R005-2771-00100  
**Pit ID:** 005-00100  
**Reviewer:** Bruce Farrar  
**Date:** May 29, 2009

Maximum Coating Usage Rate

Max Coating Rate (Gr/part)	Max Pipe Production (Parts/8-hr shift)	Max Coating Usage (kg/day) <sup>1</sup>
3.5	400.0	8.40

**METHODOLOGY**

Maximum Pipe Production is based upon the maximum rate per shift  
 Assume 24 hour per day maximum production schedule

<sup>1</sup>Max Coating Usage (kg/day) = Max Coating Rate (gram/pipe) \* Max Pipe Production (pipes/8-hr shift) \* (1/8) \* 24 \* .001 (kg/gram)

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Max Coating Usage (kg/day)	Max Coating Usage (lbs/day)	Max Coating Usage (gals/day)	Potential VOC (lbs/hour)	Potential VOC (lbs/day)	Potential VOC (ton/yr)	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Epolac 100 R Coating and Thinner	8.95	67.16%	0.0%	67.2%	0.0%	41.66%	6.01	6.01	8.40	18.48	2.06	0.09	2.06	0.38	0.49	14.43	65%

**State Potential Emissions**

**Add worst case coating and thinner**

**0.38**

**0.49**

**14.43**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
 Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
 Potential VOC Pounds per Hour = Max coating usage gals per day \* 1/density lbs per gal \* 1/24 hours per day  
 Potential VOC Pounds per Day = Max coating usage gals per day \* 1/density lbs per gal  
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
 Particulate Potential Tons per Year = (gal/day\*1/24) \* (densityt) \* (Volume % Solids) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

**Appendix A: Emission Calculations  
HAP Emission Calculations**

**Company Name: CAPCO, LLC**  
**Address City IN Zip: 1349 Arcadia Drive, Columbus, IN 47201**  
**Permit Number: R005-2771-00100**  
**Plt ID: 005-00100**  
**Reviewer: Bruce Farrar**  
**Date: May 29, 2009**

Material	Density (Lb/Gal)	Max Coating Usage (lbs/day) <sup>1</sup>	Weight % Xylene	Weight % Toluene	Xylene Emissions (lbs/day)	Xylene Emissions (ton/yr)	Toluene Emissions (lbs/day)	Toluene Emissions (ton/yr)
Epolac Coating	9.41	13.86	10.00%	20.00%	1.39	0.25	2.77	0.51
Epolac Thinner	7.58	4.62	30.00%	0.00%	1.39	0.25	-	-

**Total**

Total State Potential Emissions **0.51**      **0.51**      **1.01**

**METHODOLOGY**

HAPS emission rate (tons/yr) = Max Coating Usage per day \* Weight % HAP \*365days/yr \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name: CAPCO, LLC**  
**Address City IN Zip: 1349 Arcadia Drive, Columbus, IN 47201**  
**Permit Number: R005-2771-00100**  
**Plt ID: 005-00100**  
**Reviewer: Bruce Farrar**  
**Date: April 2, 2009**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

5.5

48.2

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100	5.5	84
				**see below		
Potential Emission in tons/yr	4.58E-02	1.83E-01	1.45E-02	2.41	1.32E-01	2.02

\*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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 5 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
HAPs Emissions**

**Company Name: CAPCO, LLC**  
**Address City IN Zip: 1349 Arcadia Drive, Columbus, IN 47201**  
**Permit Number: R005-2771-00100**  
**Pit ID: 005-00100**  
**Reviewer: Bruce Farrar**  
**Date: April 2, 2009**

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.059E-05	2.891E-05	1.807E-03	4.336E-02	8.191E-05

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.205E-05	2.650E-05	3.373E-05	9.154E-06	5.059E-05

Methodology is the same as page 4.

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



# 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](http://www.idem.IN.gov)

## SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Jeff Elkins  
Facility Supervisor  
CAPCO LLC  
1349 Arcadia Dr.  
Columbus IN 47291

DATE: June 3, 2009

FROM: Matt Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

SUBJECT: Final Decision  
Registration  
005-27721-00100

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
David Howard Cornerstone Environmental, Health & Safety, Inc.  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

IDEM Staff	BLOCCHET 6/3/2009 CAPCO, LLC 005-27721-00100 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		Jeff Elkins Facility Supervisor CAPCO, LLC 1349 Arcadia Dr Columbus IN 47201 (Source CAATS) <i>Via Confirmed Delivery</i>									
2		Columbus City Council and Mayors Office 123 Washington St Columbus IN 47201 (Local Official)									
3		Mr. Elbert Held 734 Hutchins Columbus IN 47201 (Affected Party)									
4		Mr. Boris Ladwig 333 2nd St Columbus IN 47201 (Affected Party)									
5		Eileen Booher 1316 Chestnut St. Columbus IN 47201 (Affected Party)									
6		Mr. Lcnfc 1039 Sycamore St Columbus IN 47201 (Affected Party)									
7		Bartholomew Co Public Library 536 Fifth St. Columbus IN 47201-6225 (Library)									
8		Bartholomew County Commissioners 440 Third Street Columbus IN 47202 (Local Official)									
9		Mr. Jean Terpstra 3210 Grove Pkwy Columbus IN 47203 (Affected Party)									
10		August Tindell 31 Reo Street Columbus IN 47201 (Affected Party)									
11		Terry Lowe 1110 Central Ave. Columbus IN 47201 (Affected Party)									
12		Mr. Charles Mitch 3210 Grove Parkway Columbus IN 47203 (Affected Party)									
13		Hope Branch Library 683 Main Street Hope IN 47246 (Library)									
14		Cleo Rogers Memorial Public Library 536 Fifth St Columbus IN 47202 (Library)									
15		Mr. David Howard Cornerstone Environmental, Health & Safety, Inc. 880 Lennox Court Zionsville IN 46077 (Consultant)									

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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1		Bartholomew County Health Department 440 3rd Street, Suite 303 Columbus IN 47201 (Health Department)										
2												
3												
4												
5												
6												
7												
8												
9												
10												
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12												
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