



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

TO: Interested Parties / Applicant

DATE: September 3, 2009

RE: JB Equipment, LLC / 111-28247-00021

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

Notice of Decision – Approval

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

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

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

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

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

If you have technical questions regarding the enclosed documents, please contact the 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
FNPER-AM.dot12/3/07



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Mr. Wayne Parsons
JB Equipment, LLC
PO Box 114
Morocco, IN 47963

September 3, 2009

Re: Exempt Construction and Operation Status,
111-28247-00021

Dear Mr. Wayne Parsons:

The application from JB Equipment, LLC, received on July 22, 2009, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following stationary tanker lining and coating operation located at 407 N Polk St, Morocco, IN, is classified as exempt from air pollution permit requirements:

- (a) One (1) coal slag abrasive blasting operation, identified as 001, constructed in 2006, with a maximum capacity of 10,000 cfm outlet air flow, and totally enclosed for containment.
- (b) One (1) welding operation, identified as 002, constructed in 2006, with a maximum capacity of two (2) pounds per hour of electrode consumption, per station, with:
 - (1) one (1) station flame cutting, using oxyacetylene, with a maximum metal thickness cut of 0.25 inches, and a maximum metal cutting rate of 2.0 inches per minute; and
 - (2) one (1) station flame cutting, using plasma, with a maximum metal thickness cut of 0.25 inches, and a maximum metal cutting rate of 2.0 inches per minute.
- (c) Surface coating operations, identified as 003, including:
 - (1) One (1) rubber lining adhesive operation, identified as liquefied rubber, constructed in 2006, with a maximum capacity of 5 gallons of liquefied rubber adhesive per tanker, applied by a roller or brush, and exhausting to the indoors.
 - (2) One (1) surface coating operation, identified as coating Part A and coating Part B, constructed in 2006, with a combined maximum capacity of 8 gallons of paint and hardener applied per tanker, using an airless spray gun, which has a transfer efficiency rate of 82%, and exhausting to the indoors.
- (d) One (1) residual # 5 heavy fuel oil fired boiler, identified as 004, constructed in 2006, with a maximum capacity of 2.0 MMBtu/hr, using low NOx burners as control, and exhausting to the indoors.

The following conditions shall be applicable:

1. 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:

- (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.
2. 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.
 3. 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-4(a), particulate emissions from indirect heating facilities constructed after September 21, 1983, shall be limited to the following:

For Q less than 10 MMBtu/hr, Pt shall not exceed 0.6. Since Q is 0.2 MMBtu/hr, which is less than 10 MMBtu/hr, Pt from boiler 004 shall not exceed 0.6.

This exemption is the first air approval issued to this source. A copy of the Exemption is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. 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

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions on this matter, please contact Christine L. Filutze, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, at 317-233-8397 or at 1-800-451-6027 (ext 38397).

Sincerely,



Alfred C. Dumauval, Ph. D., Section Chief
Permits Branch
Office of Air Quality

ACD/clf

cc: File - Newton County
Newton County Health Department
Compliance and Enforcement Branch
Billing, Licensing and Training Section

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

Technical Support Document (TSD) for an Exemption

Source Description and Location
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Source Name:	JB Equipment, LLC
Source Location:	407 N Polk St, Morocco, IN 47963
County:	Newton
SIC Code:	7699
Exemption No.:	111-28247-00021
Permit Reviewer:	Christine L. Filutze

On July 22, 2009, the Office of Air Quality (OAQ) received an application from JB Equipment, LLC related to the operation of an existing tanker lining and coating operation.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Newton County.

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

Fugitive Emissions

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

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by JB Equipment, LLC, on July 22, 2009, relating to a tanker lining and coating operation.

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

- (a) One (1) coal slag abrasive blasting operation, identified as 001, constructed in 2006, with a maximum capacity of 10,000 cfm outlet air flow, and totally enclosed for containment.
- (b) One (1) welding operation, identified as 002, constructed in 2006, with a maximum capacity of two (2) pounds per hour of electrode consumption, per station, with:
- (1) one (1) station flame cutting, using oxyacetylene, with a maximum metal thickness cut of 0.25 inches, and a maximum metal cutting rate of 2.0 inches per minute; and
 - (2) one (1) station flame cutting, using plasma, with a maximum metal thickness cut of 0.25 inches, and a maximum metal cutting rate of 2.0 inches per minute.
- (c) Surface coating operations, identified as 003, including:
- (1) One (1) rubber lining adhesive operation, identified as liquefied rubber, constructed in 2006, with a maximum capacity of 5 gallons of liquefied rubber adhesive per tanker, applied by a roller or brush, and exhausting to the indoors.
 - (2) One (1) surface coating operation, identified as coating Part A and coating Part B, constructed in 2006, with a combined maximum capacity of 8 gallons of paint and hardener applied per tanker, using an airless spray gun, which has a transfer efficiency rate of 82%, and exhausting to the indoors.
- (d) One (1) residual # 5 heavy fuel oil fired boiler, identified as 004, constructed in 2006, with a maximum capacity of 2.0 MMBtu/hr, using low NOx burners as control, and exhausting to the indoors.

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 – Exemption

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

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10 *	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Boiler (004)	0.05	0.05	0.05	0.49	0.35	0.00	0.03	0.00	0.17 (Toluene)
Surface Coating (003)	0.38	0.38	0.38	0.00	0.00	1.12	0.00	0.17	
Abrasive Blasting (001)	3.50	2.45	2.45	0.00	0.00	0.00	0.00	0.00	
Welding (002)	0.07	0.07	0.07	0.00	0.00	0.00	0.00	4.50E-03	
Total PTE of Entire Source	4.00	2.95	2.95	0.49	0.35	1.12	0.03	0.18	
Exemptions Levels	5	5	5	10	10	5 or 10	25	25	10
Registration Levels	25	25	25	25	25	25	100	25	10
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

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

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of 40 CFR 60, Subpart MM (Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations) (326 IAC 12) are not included in this permit because this source does not apply surface coatings to automobiles or light duty trucks as defined in 60.391.
- (b) The requirements of 40 CFR 60, Subpart SS (Standards of Performance for Industrial Surface Coating: Large Appliances) (326 IAC 12) are not included in this permit because this source does not apply surface coatings to large appliances as defined in 60.451.
- (c) 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)

- (d) The requirements of 40 CFR 63, Subpart IIII (National Emission Standard for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks) (326 IAC 20-85) are not included in this permit for this source because this source does not apply surface coating materials to the automobiles or light-duty trucks as defined in 40 CFR 63.3176.
- (e) The requirements of 40 CFR 63, Subpart KKKK (National Emission Standard for Hazardous Air Pollutants: Surface Coating of Metal Cans) (326 IAC 20-86) are not included in this permit because this source does not apply surface coating materials to metal cans as defined in 40 CFR 63.3481.
- (f) The requirements of 40 CFR 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants from Surface Coating of Miscellaneous Metal Parts and Products) (326 IAC 20-80) are not included in this permit because this source does not apply surface coating to miscellaneous metal parts and products as defined in 40 CFR 63.3881.
- (g) The requirements of 40 CFR 63, Subpart NNNN (National Emission Standard for Hazardous Air Pollutants: Surface Coating of Large Appliances) (326 IAC 20-63) are not included in this permit because this source does not apply surface coating materials large appliances as defined in 40 CFR 63.4081.
- (h) The requirements of 40 CFR 63, Subpart HHHHHH (National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources) are not included in this permit because this source does not conduct paint stripping and does not conduct miscellaneous surface coating operations as defined in 40 CFR 63.11169.
- (i) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-1.1-3 (Exemptions)
Exemption applicability is discussed under the Permit Level Determination – Exemption section above.
- (b) 326 IAC 2-4.1 (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.
- (g) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Each of the emission units at this source is not subject to the requirements of 326 IAC 8-1-6, since the unlimited VOC potential emissions from each emission unit is less than twenty-five (25) tons per year.
- (h) 326 IAC 6.5 (Particulate Emission Limitations Except Lake County)
Each of the emission units at this source is not subject to the requirements of 326 IAC 6.5, because the source is not located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne county.
- (i) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (j) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Abrasive Blasting Operations

- (k) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 326 IAC 6-3-2(b)(14), the abrasive blasting operations, identified as 001, are exempt from this rule because they have potential emissions that are less than five hundred fifty-one thousandths (0.551) pound per hour.

Welding Operations

- (l) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 326 IAC 6-3-2(b)(14), the welding operations, identified as 002, are exempt from this rule because they have potential emissions that are less than five hundred fifty-one thousandths (0.551) pound per hour.

Surface Coating Operations

- (m) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 326 IAC 6-3-2(b)(14), the surface coating operations, identified as 003, are exempt from this rule because they have potential emissions that are less than five hundred fifty-one thousandths (0.551) pound per hour.
- (n) 326 IAC 8-2-9 (Miscellaneous metal coating operations)
Pursuant to the rule applicability in 326 IAC 8-2-9, this source is not subject to 326 IAC 8-2-9.

Boiler

- (o) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-4(a), particulate emissions from indirect heating facilities constructed after September 21, 1983, shall be limited to the following:

For Q less than 10 MMBtu/hr, Pt shall not exceed 0.6. Since Q is 0.2 MMBtu/hr, which is less than 10 MMBtu/hr, Pt from boiler 004 shall not exceed 0.6.

- (p) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 326 IAC 6-3-1(b)(1), the boiler, identified as 004, is exempt from the requirements of 326 IAC 6-3, because it is considered combustion for indirect heating.
- (q) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
Pursuant to 326 IAC 7-1.1-1 (Applicability), the boiler, identified as 004, is not subject to 326 IAC 7-1.1-1 since it does not have the potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide.

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 July 22, 2009.

The operation of this source shall be subject to the conditions of the attached proposed Exemption No. 111-28247-00021. The staff recommends to the Commissioner that this Exemption be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Christine L. Filutze 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) 233-8397 or toll free at 1-800-451-6027 extension 38397.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A: Emissions Calculations
Summary**

Company Name: JB Equipment, LLC
Address City IN Zip: 407 N Polk St, Morocco, IN 47963
Exemption Number: 111-28247-00021
Reviewer: Christine L. Filutze
Date: August 31, 2009

Emission Unit	PM	PM10	PM2.5	SO2	NOx	VOC	CO	HAPs	Single Highest HAP
Boiler (004)	0.05	0.05	0.05	0.49	0.35	0.00	0.03	0.00	0.17 Toluene
Surface Coatings (003)	0.38	0.38	0.38	0.00	0.00	1.12	0.00	0.17	
Abrasive Blasting (001)	3.50	2.45	2.45	0.00	0.00	0.00	0.00	0.00	
MIG Welding (002)	0.07	0.07	0.07	0.00	0.00	0.00	0.00	4.50E-03	
Totals	4.00	2.95	2.95	0.49	0.35	1.12	0.03	0.18	

Appendix A: Emissions Calculations
Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)
#5 Fuel Oil

Company Name: JB Equipment, LLC
Address City IN Zip: 407 N Polk St, Morocco, IN 47963
Exemption Number: 111-28247-00021
Reviewer: Christine L. Filutze
Date: August 31, 2009

Heat Input Capacity
MMBtu/hr

0.20

Potential Throughput
kgals/year

12.60431655

S = Weight % Sulfur

0.5

Emission Factor in lb/kgal	Pollutant				
	PM**	SO2	NOx	VOC	CO
7.82	78.5	55.0	0.28	5.0	
<i>*see below</i>	<i>(157S)</i>				
Potential Emission in tons/yr	0.05	0.495	0.35	0.002	0.03

***Particulate Matter emission factor for #5 oil fired is $9.19(S)+3.22$ lb/kgal = $9.19*0.005+3.22$ lb/kgal**

**PM emission factor is filterable PM only. Assume PM=PM10=PM2.5

Methodology

1 gallon of #5 Fuel oil has a heating value of 139,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.139 MMBtu

Emission Factors are from AP 42 Tables 1.3-1 and 1.3-3 (SCC 1-03-004-04, 1-02-004-04) (AP-42 Supplement E 9/98)

Emission (tons/yr) = Throughput (kgals/year) x Emission Factor (lb/kgal)/2,000 lb/ton

No data are available for HAPs emissions calculations

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

**Company Name: JB Equipment, LLC
Address City IN Zip: 407 N Polk St, Morocco, IN 47963
Exemption Number: 111-28247-00021
Reviewer: Christine L. Filutze
Date: August 31, 2009**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)*	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	Transfer Efficiency
Macropoxy 646 Fast Cure Epoxy Coating (Part A), Mill White	12.19	17.4%	0.0%	17.4%	0.0%	0.00%	4.0	5.48E-03	2.12	2.12	0.05	1.11	0.20	0.17	82%
Macropoxy 646 Fast Cure Epoxy Coating (Part B), Hardener	13.46	12.3%	0.0%	12.3%	0.0%	0.00%	4.0	5.48E-03	1.66	1.66	0.04	0.87	0.16	0.20	82%
Liquefied Rubber (Endurabond Tack #3)	7.44	85.0%	0.0%	85.0%	0.0%	0.00%	5.0	5.48E-03	6.32	6.32	0.17	4.16	0.76	0.00	100%

Totals 1.12 0.38

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

One (1) quart of hardener per one (1) gallon of paint used. They use 380 gallons paint per year and 380 quarts of hardener per year. 380 quarts of hardener equals 95 gallons of hardener.

Assume PM=PM10=PM2.5

*Maximum number of units per year was determined based on an actual number of units processed of 16 tanker trucks per year and actual hours of operation of (8*365.25 = 2992 hours per year).

**Appendix A: Emissions Calculations
HAPs
From Surface Coating Operations**

**Company Name: JB Equipment, LLC
Address City IN Zip: 407 N Polk St, Morocco, IN 47963
Exemption Number: 111-28247-00021
Reviewer: Christine L. Filutze
Date: August 31, 2009**

Material	Density of Coating (lb/gal)	Maximum Material Usage (gal/unit)	Maximum Throughput* (unit/hr)	Weight % Toluene	Toluene Emissions (ton/yr)
Liquefied Rubber (Endurabond Tack #3)	7.44	5.0	5.48E-03	85%	0.17

Total Potential to Emit

0.17

METHODOLOGY

HAPS emission rate (tons/yr) = [Density of Coating (lb/gal)] * [Maximum Material Usage (gal/unit)] * [Maximum Throughput (unit/hr)] * [Weight % HAP] * [8760 hrs/yr] * [1 ton/2000 lbs]

*Maximum number of units per year was determined based on an actual number of units processed of 16 tanker trucks per year and actual hours of operation of (8*365.25 = 2922 hours per)

**Appendix A: Emissions Calculations
Welding and Thermal Cutting**

**Company Name: JB Equipment, LLC
Address City IN Zip: 407 N Polk St, Morocco, IN 47963
Exemption Number: 111-28247-00021
Reviewer: Christine L. Filutze
Date: August 31, 2009**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)	
			PM=PM10=PM2.5	Mn	Ni	Cr	PM=PM10=PM2.5	Mn	Ni	Cr		
WELDING												
Metal Inert Gas (MIG)(carbon steel)	1	2		0.0055	0.0005			0.011	0.001	0.000	0.000	0.001
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM=PM10=PM2.5	Mn	Ni	Cr	PM=PM10=PM2.5	Mn	Ni	Cr	
Oxyacetylene	1	0.25	2	0.1622	0.0005	0.0001	0.0003	0.005	1.50E-05	3.00E-06	9.00E-06	2.70E-05
Plasma**	1	0.25	2	0.0039				1.17E-04	0.00E+00	0.00E+00	0.00E+00	0.00E+00
EMISSION TOTALS												
								PM=PM10=PM2.5			Total HAPs	
Potential Emissions lbs/hr								0.016			1.03E-03	
Potential Emissions lbs/day								0.38			2.46E-02	
Potential Emissions tons/year							tons/yr 0.07			tons/yr 4.50E-03		

METHODOLOGY

AP-42, Chapter 12.19 emission factors for welding.

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

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

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

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

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

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

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

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

Assume PM=PM10=PM2.5



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

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

TO: Wayne Parsons
JB Equipment, LLC
P.O. Box 114
Morocco, IN 47963

DATE: September 3, 2009

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

SUBJECT: Final Decision
Exemption
111-28247-00021

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:
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.

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	MIDENNEY 9/3/2009 JB Equipment, LLC 111-28247-00021 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	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		Wayne Parsons JB Equipment, LLC PO Box 114 Morocco IN 47963 (Source CAATS) via confirmed delivery										
2		Mr. Charles L. Berger Attorney Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)										
3		Newton County Commissioners 201 N. 3rd Street, Courthouse Square Kentland IN 47951 (Local Official)										
4		Morocco Town Council P.O. Box 366 Morocco IN 47963 (Local Official)										
5		Newton County Health Department 4117 S. 240 W. Suite 500 Morocco IN 47963 (Health Department)										
6		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
7		Mr. Kenny Haun P.O. Box 280 Rensselaer IN 47978 (Affected Party)										
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9												
10												
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Total number of pieces Listed by Sender 6	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 Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual 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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