



# 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: March 31, 2010

RE: Roll Forming Corporation / 019-28940-00114

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. Tim Teegarden  
Roll Forming Corporation  
1205 Access Road  
Jeffersonville, IN 47130

March 31, 2010

Re: 019-28940-00114  
First Registration Notice-Only Change to  
R019-20332-00114

Dear Mr. Teegarden:

Roll Forming Corporation was issued a Registration No. R019-20332-00114 on January 12, 2005 for a stationary metal parts manufacturing operation located at 1205 Access Road, Jeffersonville, IN 47130. On February 4, 2010 and March 2, 2010, the Office of Air Quality (OAQ) received an application from the source relating to construction and operation of two (2) double head miter saws and one (1) CNC saw. On March 2, 2010, Office of Air Quality (OAQ) received another application from the source relating to construction and operation of two (2) Head Nacco Saws, a CNC machining center and change in descriptive information for various units. The addition of these units to the registration is considered a notice-only change, since the potential emissions of regulated criteria pollutants and hazardous air pollutants are less than the ranges specified in 326 IAC 2-5.5-6(d)(10) and 326 IAC 2-5.5-6(d)(12), respectively (see attached appendix A for calculations). This descriptive information change to the registration is considered a notice-only change pursuant to 326 IAC 2-5.5-6(d)(2). The uncontrolled/unlimited potential to emit of the entire source will continue to be within the threshold levels specified in 326 IAC 2-5.5-1(b)(1).

Pursuant to 326 IAC 2-5.5-6, the registration is hereby revised as described in the attached Technical Support Document (TSD).

The source shall continue to operate according to 326 IAC 2-5.5. Please find enclosed the revised registration. A copy of the registration 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](http://www.idem.in.gov)

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.  
If you have any questions on this matter, please contact Bruce Farrar, at (800) 451-6027, press 0 and ask for Bruce Farrar or extension 4-5401, or dial (317) 234-5401.

Sincerely,



Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

IC/bf

Attachment: Revised Registration

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



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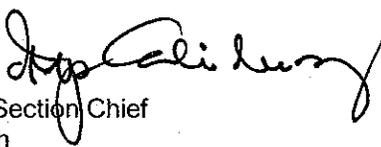
## REGISTRATION OFFICE OF AIR QUALITY

**Roll Forming Corporation**  
**1205 North Access Road**  
**Jeffersonville, IN 47130**

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. 019-20332-00114	
Original signed by: Nisha Sizemore, Section Chief Permits Branch Office of Air Quality	Issuance Date: January 12, 2005

First Registration Revision No.019-20899-00114, issued on May 18, 2005

First Notice-Only Change No. 019-28940-00114	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 31, 2010

## 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 a stationary metal parts manufacturing operation.

Source Address:	1205 North Access Road, Jeffersonville, IN 47130
Mailing Address:	1205 North Access Road, Jeffersonville, IN 47130
General Source Phone Number:	(502) 633-4437
SIC Code:	3499
County Location:	Clark County
Source Location Status:	Nonattainment for PM 2.5 standard Attainment for all other 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) Vac-U-Paint surface coating system on process line 5443, designated as Unit 3, constructed in the Spring of 2003, that applies paint to metal parts using an air atomizing spray coater, with a maximum capacity of 23,803 tons of rolled steel per year and 71 tons of paint per year, with overspray controlled by vacuum extraction through template openings, and with extracted air filtered then exhausted through Stack 1 [Under 40 CFR 63, Subpart XXXXXX, this is an affected unit];
- (b) One (1) rolled steel regalanizing spray unit on process line 5410, constructed in August 2004, where zinc is applied to rolled steel by galvanization at a maximum throughput 32,861 tons of steel per year, using zinc wire at a maximum usage rate of 8,215 pounds of zinc wire per year.
- (c) One (1) cold cleaning degreaser used to perform non-halogenated organic solvent degreasing (mineral spirits) of parts and/or tools in process line 5410, constructed in 2003, utilizing 23 gallons of solvent per year. The cold cleaner is an offline system, batch type, which uses immersion, and is equipped with drain and remote reservoir;
- (d) One (1) metal inert gas (MIG) welding station on process line 5443, designated as Unit 1, constructed in the Spring of 2003, with a maximum capacity of 23,803 tons of rolled steel per year and a maximum annual wire usage rate of 392.8 pounds of wire per year (GMAW Wire Types E70S-3, ER70S-6, and ER80S-D2);
- (e) One (1) tungsten inert gas (TIG) welding station (nonconsumable) on process line 5410, designated as Unit 2, constructed in the Spring of 2003, with a maximum capacity of 32,861 tons of rolled steel per year;
- (f) One (1) Dritech mechanical cut-off saw on process line 5443, constructed in the Spring of 2003, where cutting coolant continuously floods the machining interface, with a maximum capacity of 23,803 tons of rolled steel per year;
- (g) One (1) natural gas-fired heater on process line 5443, designated as Unit 6, constructed in the Spring of 2003, rated at 0.22 MMBtu/hr, exhausting to Stack 3;

- (h) One (1) natural gas-fired paint curing oven on process line 5443, designated as Unit 4, constructed in the Spring of 2003, rated at 1.5 MMBtu/hr, exhausting to Stack 2;
- (i) One (1) natural gas-fired heater associated with the regalvanizing spray unit on process line 5410, designated as Unit 5, constructed in August 2004, rated at with 0.22 MMBtu/hr, exhausting to Stack 4
- (j) One (1) wire brush unit associated with the regalvanizing spray unit on process line 5410 for smoothing of metal part surfaces following regalvanization, designated as Unit 5, constructed in August 2004, with a maximum capacity of 32,861 tons of rolled steel per year;
- (k) One (1) rust preventative spray unit on process line 5410, using 4.6 gallons of hydrocarbon solvent per day, constructed in 2003, with a maximum capacity of 32,861 tons of rolled steel per year;
- (l) One (1) Dreistern hydraulic cut-off unit on process line 5410, constructed in 2003, with a maximum capacity of 32,861 tons of rolled steel per year, utilizing a cutting oil for lubrication;
- (m) Insignificant activities associated with use of lubricating oils, hydraulic oils, machining oils, and/or machining fluids (including coolants) associated with process lines 5443 and 5410;
- (n) One (1) axis laser machine for custom trimming and welding of parts, with a maximum processing rate of 50 meters per minute (m/min), equipped with a dust collector.
- (o) One (1) #1 double head miter saw, constructed in 2010, with a maximum capacity of 201 tons of rolled steel tubing per year, using an aqueous cutting coolant.
- (p) One (1) #2 double head miter saw, constructed in 2010, with a maximum capacity of 201 tons of rolled steel tubing per year, using an aqueous cutting coolant and a cutting oil for lubrication.
- (q) One (1) CNC saw, constructed in 2010, with a maximum capacity of 402 tons of rolled steel tubing per year, using an aqueous cutting coolant.
- (r) One (1) #1 head Nacco dedicated saw, constructed in 2010, with a maximum capacity of 1956 tons of rolled steel tubing per year, using an aqueous cutting coolant.
- (s) One (1) #2 head Nacco dedicated saw, constructed in 2010, with a maximum capacity of 1956 tons of rolled steel tubing per year, using an aqueous cutting coolant.
- (t) One (1) CNC Machining center, constructed in 2010, with a maximum capacity of 1956 tons of rolled steel tubing per year, using an aqueous cutting coolant.
- (u) One (1) metal inert gas (MIG) welding station on process line 5448, constructed in 2010, with a maximum capacity of 3,912 tons of rolled steel per year and a maximum annual wire usage rate of 394 pounds of wire per year (GMAW Wire Types E70S and E70S-6).

## 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 the fact that continuance of this registration is not consistent with purposes of this article.

### B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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- (a) All terms and conditions of permits established prior to Registration No. 019-20332-00114 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 registration.

### B.5 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.6 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.7 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.

**B.8 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Registrant's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

- (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.
- (c) To the extent the Registrant 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.

**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 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.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 (1) Vac-U-Paint surface coating system on process line 5443, designated as Unit 3, constructed in the Spring of 2003, that applies paint to metal parts using an air atomizing spray coater, with a maximum capacity of 23,803 tons of rolled steel per year and 71 tons of paint per year, with overspray controlled by vacuum extraction through template openings, and with extracted air filtered then exhausted through Stack 1; [Under 40 CFR 63, Subpart XXXXXX, this is an affected unit].
- (b) One (1) rolled steel regalanizing spray unit on process line 5410, constructed in August 2004, where zinc is applied to rolled steel by galvanization at a maximum throughput 32,861 tons of steel per year, using zinc wire at a maximum usage rate of 8,215 pounds of zinc wire per year.

(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 Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the Vac-U-Paint coating system and Hydraulic Cut-Off Line 5410 applicators.
- (b) Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of Vac-U-Paint coating system and Hydraulic Cut-Off Line 5410 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.1.2 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the the Vac-U-Paint surface coating system shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

#### D.1.3 Particulate [326 IAC 6-3-2]

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Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emission from the reglvanization spray unit shall not exceed 9.94 pound per hour when operating at a maximum process weight rate of 32,861 tons of steel per year. This PM emission limit shall be established as E in the following formula:

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

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

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

##### D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

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

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

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

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

##### D.1.5 Record Keeping Requirements

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- (a) To document compliance with condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limit established in condition No. 3.
- (1) The VOC content of each coating material and solvent used less water.
  - (2) The amount of coating material and solvent used on daily basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
  - (3) The volume weighted average VOC content of the coatings used for each day;
  - (4) The daily cleanup solvent usage; and
  - (5) The total VOC usage for each day.
- (b) All records shall be maintained for a period of at least five (5) years from the date of this registration. 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.

- (c) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of this registration issuance.

## SECTION D.2

## OPERATION CONDITIONS

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

- (c) One (1) cold cleaning degreaser used to perform non-halogenated organic solvent degreasing (mineral spirits) of parts and/or tools in process line 5410, constructed in 2003, utilizing 23 gallons of solvent per year. The cold cleaner is an offline system, batch type, which uses immersion, and is equipped with drain and remote reservoir;

(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 Cold Cleaner Operations [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the Permittee shall operate the cold cleaner degreaser as follows:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (6) 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.

#### D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaning Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

#### D.2.3 Record Keeping Requirements

To document compliance with Condition D.2.2, the Permittee shall maintain the following records for each purchase of solvent. These records shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

- (a) The name and address of the solvent supplier.
- (b) The date of purchase.
- (c) The type of solvent.
- (d) The volume of each unit of solvent.
- (e) The total volume of the solvent.

- (f) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

## SECTION E.1

## OPERATION CONDITIONS

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

- (a) One (1) Vac-U-Paint surface coating system on process line 5443, designated as Unit 3, constructed in the Spring of 2003, that applies paint to metal parts using an air atomizing spray coater, with a maximum capacity of 23,803 tons of rolled steel per year and 71 tons of paint per year, with overspray controlled by vacuum extraction through template openings, and with extracted air filtered then exhausted through Stack 1; [Under 40 CFR 63, Subpart XXXXXX, this is an affected unit]

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

### E.3.1 General Provisions Relating to NESHAP XXXXXX [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.11523, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in 40 CFR Part 63, Subpart XXXXXX in accordance with the schedule in 40 CFR 63 Subpart XXXXXX.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

### E.3.2 Nine Metal Fabrication and Finishing Source Categories NESHAP [40 CFR Part 63, Subpart XXXXXX]

The Permittee which engages in fabricated metal products production shall comply with the following provisions of 40 CFR 63, Subpart XXXXXX (included as Attachment A of this permit), with a compliance date of July 25, 2011:

- (1) 40 CFR 63.11514 (a), (b) (4), (c)
- (2) 40 CFR 63.11515
- (3) 40 CFR 63.11516 (d)
- (4) 40 CFR 63.11517
- (5) 40 CFR 63.11519
- (6) 40 CFR 63.11521
- (7) 40 CFR 63.11522
- (8) 40 CFR 63.11523
- (9) Table 1
- (10) Table 2

**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>	Roll Forming Corporation
<b>Address:</b>	1205 North Access Road,
<b>City:</b>	Jeffersonville, IN 47130
<b>Phone Number:</b>	(502) 633-4437
<b>Registration No.:</b>	019-20332-00114

I hereby certify that Roll Forming Corporation is :

still in operation.

I hereby certify that Roll Forming Corporation is :

no longer in operation.

in compliance with the requirements of Registration No. 019-20332-00114.

not in compliance with the requirements of Registration No. 019-20332-00114.

<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**

**Attachment A**

**National Emission Standards for Hazardous Air Pollutants  
Requirements, Subpart XXXXXX**

**For Roll Forming Corporation**

## **Title 40: Protection of Environment**

### **PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES**

#### **Subpart XXXXXX—National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories**

**Source:** 73 FR 43000, July 23, 2008, unless otherwise noted.

#### **Applicability and Compliance Dates**

##### **§ 63.11514 Am I subject to this subpart?**

(a) You are subject to this subpart if you own or operate an area source that is primarily engaged in the operations in one of the nine source categories listed in paragraphs (a)(1) through (9) of this section. Descriptions of these source categories are shown in Table 1 of this subpart. "Primarily engaged" is defined in §63.11522, "What definitions apply to this subpart?"

(1) Electrical and Electronic Equipment Finishing Operations;

(2) Fabricated Metal Products;

(3) Fabricated Plate Work (Boiler Shops);

(4) Fabricated Structural Metal Manufacturing;

(5) Heating Equipment, except Electric;

(6) Industrial Machinery and Equipment Finishing Operations;

(7) Iron and Steel Forging;

(8) Primary Metal Products Manufacturing; and

(9) Valves and Pipe Fittings.

(b) The provisions of this subpart apply to each new and existing affected source listed and defined in paragraphs (b)(1) through (5) of this section if you use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent for carcinogens, as defined by OSHA at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens. For the MFHAP, this corresponds to materials that contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material.

(1) A dry abrasive blasting affected source is the collection of all equipment and activities necessary to perform dry abrasive blasting operations which use materials that contain MFHAP or that have the potential to emit MFHAP.

(2) A machining affected source is the collection of all equipment and activities necessary to perform machining operations which use materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or that have the potential to emit MFHAP.

(3) A dry grinding and dry polishing with machines affected source is the collection of all equipment and activities necessary to perform dry grinding and dry polishing with machines operations which use materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or have the potential to emit MFHAP.

(4) A spray painting affected source is the collection of all equipment and activities necessary to perform spray-applied painting operations using paints which contain MFHAP. A spray painting affected source includes all equipment used to apply cleaning materials to a substrate to prepare it for paint application (surface preparation) or to remove dried paint; to apply a paint to a substrate (paint application) and to dry or cure the paint after application; or to clean paint operation equipment (equipment cleaning). Affected source(s) subject to the requirements of this paragraph are not subject to the miscellaneous surface coating provisions of subpart HHHHHH of this part, "National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources."

(5) A welding affected source is the collection of all equipment and activities necessary to perform welding operations which use materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or have the potential to emit MFHAP.

(c) An affected source is existing if you commenced construction or reconstruction of the affected source, as defined in §63.2, "General Provisions" to part 63, before April 3, 2008.

(d) An affected source is new if you commenced construction or reconstruction of the affected source, as defined in §63.2, "General Provisions" to part 63, on or after April 3, 2008.

(e) This subpart does not apply to research or laboratory facilities, as defined in section 112(c)(7) of the Clean Air Act (CAA).

(f) This subpart does not apply to tool or equipment repair operations, facility maintenance, or quality control activities as defined in §63.11522, "What definitions apply to this subpart?"

(g) This subpart does not apply to operations performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such state), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.

(h) This subpart does not apply to operations that produce military munitions, as defined in §63.11522, "What definitions apply to this subpart?", manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such state), or equipment directly and exclusively used for the purposes of transporting military munitions.

(i) You are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided you are not otherwise required by law to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a). Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart.

### **§ 63.11515 What are my compliance dates?**

(a) If you own or operate an existing affected source, you must achieve compliance with the applicable provisions in this subpart by July 25, 2011.

(b) If you own or operate a new affected source, you must achieve compliance with the applicable provisions in this subpart by July 23, 2008, or upon startup of your affected source, whichever is later.

## **Standards and Compliance Requirements**

### **§ 63.11516 What are my standards and management practices?**

(a) *Dry abrasive blasting standards.* If you own or operate a new or existing dry abrasive blasting affected source, you must comply with the requirements in paragraphs (a)(1) through (3) of this section, as applicable, for each dry

abrasive blasting operation that uses materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. These requirements do not apply when abrasive blasting operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.

(1) *Standards for dry abrasive blasting of objects performed in totally enclosed and unvented blast chambers.* If you own or operate a new or existing dry abrasive blasting affected source which consists of an abrasive blasting chamber that is totally enclosed and unvented, as defined in §63.11522, "What definitions apply to this subpart?", you must implement management practices to minimize emissions of MFHAP. These management practices are the practices specified in paragraph (a)(1)(i) and (ii) of this section.

(i) You must minimize dust generation during emptying of abrasive blasting enclosures; and

(ii) You must operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions.

(2) *Standards for dry abrasive blasting of objects performed in vented enclosures.* If you own or operate a new or existing dry abrasive blasting affected source which consists of a dry abrasive blasting operation which has a vent allowing any air or blast material to escape, you must comply with the requirements in paragraphs (a)(2)(i) and (ii) of this section. Dry abrasive blasting operations for which the items to be blasted exceed 8 feet (2.4 meters) in any dimension, may be performed subject to the requirements in paragraph (a)(3) of this section.

(i) You must capture emissions and vent them to a filtration control device. You must operate the filtration control device according to manufacturer's instructions, and you must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by the requirements in §63.11519(c)(4), "What are my notification, recordkeeping, and reporting requirements?"

(ii) You must implement the management practices to minimize emissions of MFHAP as specified in paragraphs (a)(2)(ii)(A) through (C) of this section.

(A) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and

(B) You must enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials; and

(C) You must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.

(3) *Standards for dry abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension.* If you own or operate a new or existing dry abrasive blasting affected source which consists of a dry abrasive blasting operation which is performed on objects greater than 8 feet (2.4 meters) in any one dimension, you may implement management practices to minimize emissions of MFHAP as specified in paragraph (a)(3)(i) of this section instead of the practices required by paragraph (a)(2) of this section. You must demonstrate that management practices are being implemented by complying with the requirements in paragraphs (a)(3)(ii) through (iv) of this section.

(i) Management practices for dry abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension are specified in paragraphs (a)(3)(i)(A) through (E) of this section.

(A) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and

(B) You must enclose abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive material; and

(C) You must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions; and

(D) You must not re-use dry abrasive blasting media unless contaminants (i.e., any material other than the base metal, such as paint residue) have been removed by filtration or screening, and the abrasive material conforms to its original size; and

(E) Whenever practicable, you must switch from high particulate matter (PM)-emitting blast media (e.g., sand) to low PM-emitting blast media (e.g., crushed glass, specular hematite, steel shot, aluminum oxide), where PM is a surrogate for MFHAP.

(ii) You must perform visual determinations of fugitive emissions, as specified in §63.11517(b), "What are my monitoring requirements?", according to paragraphs (a)(3)(ii)(A) or (B) of this section, as applicable.

(A) For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed outdoors, you must perform visual determinations of fugitive emissions at the fenceline or property border nearest to the outdoor dry abrasive blasting operation.

(B) For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed indoors, you must perform visual determinations of fugitive emissions at the primary vent, stack, exit, or opening from the building containing the abrasive blasting operations.

(iii) You must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in §63.11519(c)(2), "What are my notification, recordkeeping, and reporting requirements?"

(iv) If visible fugitive emissions are detected, you must perform corrective actions until the visible fugitive emissions are eliminated, at which time you must comply with the requirements in paragraphs (a)(3)(iv)(A) and (B) of this section.

(A) You must perform a follow-up inspection for visible fugitive emissions in accordance with §63.11517(a), "Monitoring Requirements."

(B) You must report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, with your annual certification and compliance report as required by §63.11519(b)(5), "Notification, recordkeeping, and reporting requirements."

(b) *Standards for machining.* If you own or operate a new or existing machining affected source, you must implement management practices to minimize emissions of MFHAP as specified in paragraph (b)(1) and (2) of this section for each machining operation that uses materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. These requirements do not apply when machining operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP.

(1) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and

(2) You must operate all equipment associated with machining according to manufacturer's instructions.

(c) *Standards for dry grinding and dry polishing with machines.* If you own or operate a new or existing dry grinding and dry polishing with machines affected source, you must comply with the requirements of paragraphs (c)(1) and (2) of this section for each dry grinding and dry polishing with machines operation that uses materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. These requirements do not apply when dry grinding and dry polishing operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP.

(1) You must capture emissions and vent them to a filtration control device. You must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by the requirements in §63.11519(c)(4), "Notification, recordkeeping, and reporting Requirements."

(2) You must implement management practices to minimize emissions of MFHAP as specified in paragraphs (c)(2)(i) and (ii) of this section.

(i) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable;

(ii) You must operate all equipment associated with the operation of dry grinding and dry polishing with machines, including the filtration control device, according to manufacturer's instructions.

(d) *Standards for control of MFHAP in spray painting.* If you own or operate a new or existing spray painting affected source, as defined in §63.11514 (b)(4), "Am I subject to this subpart?," you must implement the management practices in paragraphs (d)(1) through (9) of this section when a spray-applied paint that contains MFHAP is being applied. These requirements do not apply when spray-applied paints that do not contain MFHAP are being applied.

(1) *Standards for spray painting for MFHAP control.* All spray-applied painting of objects must meet the requirements of paragraphs (d)(1)(i) through (iii) of this section. These requirements do not apply to affected sources located at Fabricated Structural Metal Manufacturing facilities, as described in Table 1, "Description of Source Categories Affected by this Subpart," or affected sources that spray paint objects greater than 15 feet (4.57 meters), that are not spray painted in spray booths or spray rooms.

(i) Spray booths or spray rooms must have a full roof, at least two complete walls, and one or two complete side curtains or other barrier material so that all four sides are covered. The spray booths or spray rooms must be ventilated so that air is drawn into the booth and leaves only through the filter. The roof may contain narrow slots for connecting fabricated products to overhead cranes, and/or for cords or cables.

(ii) All spray booths or spray rooms must be fitted with a type of filter technology that is demonstrated to achieve at least 98 percent capture of MFHAP. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see §63.14). The test coating for measuring filter efficiency shall be a high-solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-High Volume Low Pressure) air-atomized spray gun operating at 40 psi air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement.

(iii) You must perform regular inspection and replacement of the filters in all spray booths or spray rooms according to manufacturer's instructions, and maintain documentation of these activities, as detailed in §63.11519(c)(5), "Notification, recordkeeping, and reporting requirements."

(iv) As an alternative compliance requirement, spray booths or spray rooms equipped with a water curtain, called "waterwash" or "waterspray" booths or spray rooms that are operated and maintained according to the manufacturer's specifications and that achieve at least 98 percent control of MFHAP, may be used in lieu of the spray booths or spray rooms requirements of paragraphs (d)(1)(i) through (iii) of this section.

(2) *Standards for spray painting application equipment of all objects painted for MFHAP control.* All paints applied via spray-applied painting must be applied with a high-volume, low-pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated to achieve transfer efficiency comparable to one of these spray gun technologies for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002", Revision 0 (incorporated by reference, see §63.14).

(3) *Spray system recordkeeping.* You must maintain documentation of the HVLP or other high transfer efficiency spray paint delivery methods, as detailed in §63.11519(c)(7), "Notification, recordkeeping, and reporting requirements."

(4) *Spray gun cleaning.* All cleaning of paint spray guns must be done with either non-HAP gun cleaning solvents, or in such a manner that an atomized mist of spray of gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent. Spray gun cleaning may be done with, for example, by hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of these non-atomizing methods may also be used.

(5) *Spray painting worker certification.* All workers performing painting must be certified that they have completed training in the proper spray application of paints and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (d)(6) of this section. The spray application of paint is prohibited by persons who are not certified as having completed the training described in paragraph (d)(6) of this section. The requirements of this paragraph do not apply to the students of an accredited painting training program who are under the direct supervision of an instructor who meets the requirements of this paragraph. The requirements of this paragraph do not apply to operators of robotic or automated painting operations.

(6) *Spray painting training program content.* Each owner or operator of an affected spray painting affected source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply paints are trained in the proper application of paints as required by paragraph (d)(5) of this section. The training program must include, at a minimum, the items listed in paragraphs (d)(6)(i) through (iii) of this section.

(i) A list of all current personnel by name and job description who are required to be trained;

(ii) Hands-on, or in-house or external classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (d)(6)(ii)(A) through (D) of this section.

(A) Spray gun equipment selection, set up, and operation, including measuring paint viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.

(B) Spray technique for different types of paints to improve transfer efficiency and minimize paint usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.

(C) Routine spray booth and filter maintenance, including filter selection and installation.

(D) Environmental compliance with the requirements of this subpart.

(iii) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Alternatively, owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (d)(6)(ii) of this section are not required to provide the initial training required by that paragraph to these painters.

(7) *Records of spray painting training.* You must maintain records of employee training certification for use of HVLP or other high transfer efficiency spray paint delivery methods as detailed in §63.11519(c)(8), "Notification, recordkeeping, and reporting requirements."

(8) *Spray painting training dates.* As required by paragraph (d)(5) of this section, all new and existing personnel at an affected spray painting affected source, including contract personnel, who spray apply paints must be trained by the dates specified in paragraphs (d)(8)(i) and (ii) of this section.

(i) If your source is a new source, all personnel must be trained and certified no later than January 20, 2009, 180 days after startup, or 180 days after hiring, whichever is later. Training that was completed within 5 years prior to the

date training is required, and that meets the requirements specified in paragraph (d)(6)(ii) of this section satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.

(ii) If your source is an existing source, all personnel must be trained and certified no later than July 25, 2011, or 180 days after hiring, whichever is later. Worker training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in paragraph (d)(6)(ii) of this section, satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.

(9) *Duration of training validity.* Training and certification will be valid for a period not to exceed 5 years after the date the training is completed. All personnel must receive refresher training that meets the requirements of this section and be re-certified every 5 years.

(e) [Reserved]

(f) *Standards for welding.* If you own or operate a new or existing welding affected source, you must comply with the requirements in paragraphs (f)(1) and (2) of this section for each welding operation that uses materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. If your welding affected source uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), you must demonstrate that management practices or fume control measures are being implemented by complying with the requirements in paragraphs (f)(3) through (8) of this section. The requirements in paragraphs (f)(1) through (8) of this section do not apply when welding operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.

(1) You must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. You must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, as specified by the requirements in §63.11519(c)(4), "Notification, recordkeeping, and reporting requirements."

(2) You must implement one or more of the management practices specified in paragraphs (f)(2)(i) through (v) of this section to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment.

(i) Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)—also called metal inert gas welding (MIG));

(ii) Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;

(iii) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;

(iv) Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and

(v) Use a welding fume capture and control system, operated according to the manufacturer's specifications.

(3) *Tier 1 compliance requirements for welding.* You must perform visual determinations of welding fugitive emissions as specified in §63.11517(b), "Monitoring requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations. You must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in §63.11519(c)(2), "Notification, recordkeeping, and reporting requirements."

(4) *Requirements upon initial detection of visible emissions from welding.* If visible fugitive emissions are detected during any visual determination required in paragraph (f)(3) of this section, you must comply with the requirements in paragraphs (f)(4)(i) and (ii) of this section.

(i) Perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with paragraph (f)(2) of this section. After completing such corrective actions, you must perform a follow-up inspection for visible fugitive emissions in accordance with §63.11517(a), "Monitoring Requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations.

(ii) Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, and submit with your annual certification and compliance report as required by §63.11519(b)(5), "Notification, recordkeeping, and reporting requirements."

(5) *Tier 2 requirements upon subsequent detection of visible emissions.* If visible fugitive emissions are detected more than once during any consecutive 12 month period (notwithstanding the results of any follow-up inspections), you must comply with paragraphs (f)(5)(i) through (iv) of this section.

(i) Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, you must conduct a visual determination of emissions opacity, as specified in §63.11517(c), "Monitoring requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations.

(ii) In lieu of the requirement of paragraph (f)(3) of this section to perform visual determinations of fugitive emissions with EPA Method 22, you must perform visual determinations of emissions opacity in accordance with §63.11517(d), "Monitoring Requirements," using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.

(iii) You must keep a record of each visual determination of emissions opacity performed in accordance with paragraphs (f)(5)(i) or (ii) of this section, along with any subsequent corrective action taken, in accordance with the requirements in §63.11519(c)(3), "Notification, recordkeeping, and reporting requirements."

(iv) You must report the results of all visual determinations of emissions opacity performed in accordance with paragraphs (f)(5)(i) or (ii) of this section, along with any subsequent corrective action taken, and submit with your annual certification and compliance report as required by §63.11519(b)(6), "Notification, recordkeeping, and reporting requirements."

(6) *Requirements for opacities less than or equal to 20 percent but greater than zero.* For each visual determination of emissions opacity performed in accordance with paragraph (f)(5) of this section for which the average of the six-minute average opacities recorded is 20 percent or less but greater than zero, you must perform corrective actions, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with paragraph (f)(2) of this section.

(7) *Tier 3 requirements for opacities exceeding 20 percent.* For each visual determination of emissions opacity performed in accordance with paragraph (f)(5) of this section for which the average of the six-minute average opacities recorded exceeds 20 percent, you must comply with the requirements in paragraphs (f)(7)(i) through (v) of this section.

(i) You must submit a report of exceedence of 20 percent opacity, along with your annual certification and compliance report, as specified in §63.11519(b)(8), "Notification, recordkeeping, and reporting requirements," and according to the requirements of §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."

(ii) Within 30 days of the opacity exceedence, you must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in paragraph (f)(8) of this section. If you have already prepared a Site-Specific Welding Emissions Management Plan in accordance with this paragraph, you must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.

(iii) During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, you must continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in §63.11517(d), "Monitoring Requirements," using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.

(iv) You must maintain records of daily visual determinations of emissions opacity performed in accordance with paragraph (f)(7)(iii) of this section, during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with the requirements in §63.11519(b)(9), "Notification, recordkeeping, and reporting requirements."

(v) You must include these records in your annual certification and compliance report, according to the requirements of §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."

(8) *Site-Specific Welding Emissions Management Plan*. The Site-Specific Welding Emissions Management Plan must comply with the requirements in paragraphs (f)(8)(i) through (iii) of this section.

(i) Site-Specific Welding Emissions Management Plan must contain the information in paragraphs (f)(8)(i)(A) through (F) of this section.

(A) Company name and address;

(B) A list and description of all welding operations which currently comprise the welding affected source;

(C) A description of all management practices and/or fume control methods in place at the time of the opacity exceedence;

(D) A list and description of all management practices and/or fume control methods currently employed for the welding affected source;

(E) A description of additional management practices and/or fume control methods to be implemented pursuant to paragraph (f)(7)(ii) of this section, and the projected date of implementation; and

(F) Any revisions to a Site-Specific Welding Emissions Management Plan must contain copies of all previous plan entries, pursuant to paragraphs (f)(8)(i)(D) and (E) of this section.

(ii) The Site-Specific Welding Emissions Management Plan must be updated annually to contain current information, as required by paragraphs (f)(8)(i)(A) through (C) of this section, and submitted with your annual certification and compliance report, according to the requirements of §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."

(iii) You must maintain a copy of the current Site-Specific Welding Emissions Management Plan in your records in a readily-accessible location for inspector review, in accordance with the requirements in §63.11519(c)(12), "Notification, recordkeeping, and reporting requirements."

### **§ 63.11517 What are my monitoring requirements?**

(a) *Visual determination of fugitive emissions, general*. Visual determination of fugitive emissions must be performed according to the procedures of EPA Method 22, of 40 CFR part 60, Appendix A-7. You must conduct the EPA Method 22 test while the affected source is operating under normal conditions. The duration of each EPA Method 22 test must be at least 15 minutes, and visible emissions will be considered to be present if they are detected for more than six minutes of the fifteen minute period.

(b) *Visual determination of fugitive emissions, graduated schedule*. Visual determinations of fugitive emissions must be performed in accordance with paragraph (a) of this section and according to the schedule in paragraphs (b)(1) through (4) of this section.

(1) *Daily Method 22 Testing*. Perform visual determination of fugitive emissions once per day, on each day the process is in operation, during operation of the process.

(2) *Weekly Method 22 Testing*. If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests, performed in accordance with paragraph (b)(1) of this section for 10 days of work day operation of the process, you may decrease the frequency of EPA Method 22 testing to once every five days of operation of the process (one

calendar week). If visible fugitive emissions are detected during these tests, you must resume EPA Method 22 testing of that operation once per day during each day that the process is in operation, in accordance with paragraph (b)(1) of this section.

(3) *Monthly Method 22 Testing.* If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed in accordance with paragraph (b)(2) of this section, you may decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, you must resume weekly EPA Method 22 in accordance with paragraph (b)(2) of this section.

(4) *Quarterly Method 22 Testing.* If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with paragraph (b)(3) of this section, you may decrease the frequency of EPA Method 22 testing to once per 60 days of operation of the process (3 calendar months). If visible fugitive emissions are detected during these tests, you must resume monthly EPA Method 22 in accordance with paragraph (b)(3) of this section.

(c) *Visual determination of emissions opacity for welding Tier 2 or 3, general.* Visual determination of emissions opacity must be performed in accordance with the procedures of EPA Method 9, of 40 CFR part 60, Appendix A-4, and while the affected source is operating under normal conditions. The duration of the EPA Method 9 test shall be thirty minutes.

(d) *Visual determination of emissions opacity for welding Tier 2 or 3, graduated schedule.* You must perform visual determination of emissions opacity in accordance with paragraph (c) of this section and according to the schedule in paragraphs (d)(1) through (5) of this section.

(1) *Daily Method 9 testing for welding, Tier 2 or 3.* Perform visual determination of emissions opacity once per day during each day that the process is in operation.

(2) *Weekly Method 9 testing for welding, Tier 2 or 3.* If the average of the six minute opacities recorded during any of the daily consecutive EPA Method 9 tests performed in accordance with paragraph (d)(1) of this section does not exceed 20 percent for 10 days of operation of the process, you may decrease the frequency of EPA Method 9 testing to once per five days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, you must resume testing every day of operation of the process according to the requirements of paragraph (d)(1) of this section.

(3) *Monthly Method 9 testing for welding Tier 2 or 3.* If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (d)(2) of this section does not exceed 20 percent for four consecutive weekly tests, you may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, you must resume testing every five days of operation of the process according to the requirements of paragraph (d)(2) of this section.

(4) *Quarterly Method 9 testing for welding Tier 2 or 3.* If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (d)(3) of this section does not exceed 20 percent for three consecutive monthly tests, you may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, you must resume testing every 21 days (month) of operation of the process according to the requirements of paragraph (d)(3) of this section.

(5) *Return to Method 22 testing for welding, Tier 2 or 3.* If, after two consecutive months of testing, the average of the six minute opacities recorded during any of the monthly EPA Method 9 tests performed in accordance with paragraph (d)(3) of this section does not exceed 20 percent, you may resume EPA Method 22 testing as in paragraphs (b)(3) and (4) of this section. In lieu of this, you may elect to continue performing EPA Method 9 tests in accordance with paragraphs (d)(3) and (4) of this section.

**§ 63.11518 [Reserved]**

### § 63.11519 What are my notification, recordkeeping, and reporting requirements?

(a) *What notifications must I submit?* —(1) *Initial notification.* If you are the owner or operator of an area source in one of the nine metal fabrication and finishing source categories, as defined in §63.11514 “Am I subject to this subpart?,” you must submit the Initial Notification required by §63.9(b) “General Provisions,” for a new affected source no later than 120 days after initial startup or November 20, 2008, whichever is later. For an existing affected source, you must submit the Initial Notification no later than July 25, 2011. Your Initial Notification must provide the information specified in paragraphs (a)(1)(i) through (iv) of this section.

(i) The name, address, phone number and e-mail address of the owner and operator;

(ii) The address (physical location) of the affected source;

(iii) An identification of the relevant standard (i.e., this subpart); and

(iv) A brief description of the type of operation. For example, a brief characterization of the types of products (e.g., aerospace components, sports equipment, etc.), the number and type of processes, and the number of workers usually employed.

(2) *Notification of compliance status.* If you are the owner or operator of an existing affected source, you must submit a notification of compliance status on or before November 22, 2011. If you are the owner or operator of a new affected source, you must submit a notification of compliance status within 120 days after initial startup, or by November 20, 2008, whichever is later. You are required to submit the information specified in paragraphs (a)(2)(i) through (iv) of this section with your notification of compliance status:

(i) Your company's name and address;

(ii) A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart;

(iii) If you operate any spray painting affected sources, the information required by §63.11516(e)(3)(vi)(C), “Compliance demonstration,” or §63.11516(e)(4)(ix)(C), “Compliance demonstration,” as applicable; and

(iv) The date of the notification of compliance status.

(b) *What reports must I prepare or submit?* —(1) *Annual certification and compliance reports.* You must prepare and submit annual certification and compliance reports for each affected source according to the requirements of paragraphs (b)(2) through (7) of this section. The annual certification and compliance reporting requirements may be satisfied by reports required under other parts of the CAA, as specified in paragraph (b)(3) of this section.

(2) *Dates.* Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), “General Provisions,” you must prepare and submit each annual certification and compliance report according to the dates specified in paragraphs (b)(2)(i) through (iii) of this section. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(i) The first annual certification and compliance report must cover the first annual reporting period which begins the day after the compliance date and ends on December 31.

(ii) Each subsequent annual certification and compliance report must cover the subsequent semiannual reporting period from January 1 through December 31.

(iii) Each annual certification and compliance report must be prepared and submitted no later than January 31 and kept in a readily-accessible location for inspector review. If an exceedance has occurred during the year, each annual

certification and compliance report must be submitted along with the exceedence reports, and postmarked or delivered no later than January 31.

(3) *Alternate dates.* For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, "Title V."

(i) If the permitting authority has established dates for submitting annual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), "Title V," you may prepare or submit, if required, the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (b)(2)(iii) of this section.

(ii) If an affected source prepares or submits an annual certification and compliance report pursuant to this section along with, or as part of, the monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), "Title V," and the compliance report includes all required information concerning exceedences of any limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same exceedences in the annual monitoring report. However, submission of an annual certification and compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(4) *General requirements.* The annual certification and compliance report must contain the information specified in paragraphs (b)(4)(i) through (iii) of this section, and the information specified in paragraphs (b)(5) through (7) of this section that is applicable to each affected source.

(i) Company name and address;

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and

(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(5) *Visual determination of fugitive emissions requirements.* The annual certification and compliance report must contain the information specified in paragraphs (b)(5)(i) through (iii) of this section for each affected source which performs visual determination of fugitive emissions in accordance with §63.11517(a), "Monitoring requirements."

(i) The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;

(ii) A description of the corrective actions taken subsequent to the test; and

(iii) The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.

(6) *Visual determination of emissions opacity requirements.* The annual certification and compliance report must contain the information specified in paragraphs (b)(6)(i) through (iii) of this section for each affected source which performs visual determination of emissions opacity in accordance with §63.11517(c), "Monitoring requirements."

(i) The date of every visual determination of emissions opacity;

(ii) The average of the six-minute opacities measured by the test; and

(iii) A description of any corrective action taken subsequent to the test.

(7) [Reserved]

(8) *Exceedences of 20 percent opacity for welding affected sources.* As required by §63.11516(f)(7)(i), "Requirements for opacities exceeding 20 percent," you must prepare an exceedence report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20 percent. This report must be submitted along with your annual certification and compliance report according to the requirements in paragraph (b)(1) of this section, and must contain the information in paragraphs (b)(8)(iii)(A) and (B) of this section.

(A) The date on which the exceedence occurred; and

(B) The average of the six-minute average opacities recorded during the visual determination of emissions opacity.

(9) *Site-specific Welding Emissions Management Plan reporting.* You must submit a copy of the records of daily visual determinations of emissions recorded in accordance with §63.11516(f)(7)(iv), "Tier 3 requirements for opacities exceeding 20 percent," and a copy of your Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan pursuant to §63.11516(f)(8), "Site-specific Welding Emission Management Plan," along with your annual certification and compliance report, according to the requirements in paragraph (b)(1) of this section.

(c) *What records must I keep?* You must collect and keep records of the data and information specified in paragraphs (c)(1) through (13) of this section, according to the requirements in paragraph (c)(14) of this section.

(1) *General compliance and applicability records.* Maintain information specified in paragraphs (c)(1)(i) through (ii) of this section for each affected source.

(i) Each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report.

(ii) Records of the applicability determinations as in §63.11514(b)(1) through (5), "Am I subject to this subpart," listing equipment included in its affected source, as well as any changes to that and on what date they occurred, must be maintained for 5 years and be made available for inspector review at any time.

(2) *Visual determination of fugitive emissions records.* Maintain a record of the information specified in paragraphs (c)(2)(i) through (iii) of this section for each affected source which performs visual determination of fugitive emissions in accordance with §63.11517(a), "Monitoring requirements."

(i) The date and results of every visual determination of fugitive emissions;

(ii) A description of any corrective action taken subsequent to the test; and

(iii) The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.

(3) *Visual determination of emissions opacity records.* Maintain a record of the information specified in paragraphs (c)(3)(i) through (iii) of this section for each affected source which performs visual determination of emissions opacity in accordance with §63.11517(c), "Monitoring requirements."

(i) The date of every visual determination of emissions opacity; and

(ii) The average of the six-minute opacities measured by the test; and

(iii) A description of any corrective action taken subsequent to the test.

(4) Maintain a record of the manufacturer's specifications for the control devices used to comply with §63.11516, "What are my standards and management practices?"

(5) *Spray paint booth filter records.* Maintain a record of the filter efficiency demonstrations and spray paint booth filter maintenance activities, performed in accordance with §63.11516(d)(1)(ii) and (iii), "Requirements for spray painting objects in spray booths or spray rooms."

(6) *Waterspray booth or water curtain efficiency tests.* Maintain a record of the water curtain efficiency demonstrations performed in accordance with §63.11516(d)(1)(ii), "Requirements for spray painting objects in spray booths or spray rooms."

(7) *HVLP or other high transfer efficiency spray delivery system documentation records.* Maintain documentation of HVLP or other high transfer efficiency spray paint delivery systems, in compliance with §63.11516(d)(3), "Requirements for spray painting of all objects." This documentation must include the manufacturer's specifications for the equipment and any manufacturer's operation instructions. If you have obtained written approval for an alternative spray application system in accordance with §63.11516(d)(2), "Spray painting of all objects," you must maintain a record of that approval along with documentation of the demonstration of equivalency.

(8) *HVLP or other high transfer efficiency spray delivery system employee training documentation records.* Maintain certification that each worker performing spray painting operations has completed the training specified in §63.11516(d)(6), "Requirements for spray painting of all objects," with the date the initial training and the most recent refresher training was completed.

(9)–(10) [Reserved]

(11) *Visual determination of emissions opacity performed during the preparation (or revision) of the Site-Specific Welding Emissions Management Plan.* You must maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific Welding Emissions Management Plan, in accordance with §63.11516(f)(7)(iii), "Requirements for opacities exceeding 20 percent."

(12) *Site-Specific Welding Emissions Management Plan.* If you have been required to prepare a plan in accordance with §63.11516(f)(7)(iii), "Site-Specific Welding Emissions Management Plan," you must maintain a copy of your current Site-Specific Welding Emissions Management Plan in your records and it must be readily available for inspector review.

(13) *Manufacturer's instructions.* If you comply with this subpart by operating any equipment according to manufacturer's instruction, you must keep these instructions readily available for inspector review.

(14) *Welding Rod usage.* If you operate a new or existing welding affected source which is not required to comply with the requirements of §63.11516(f)(3) through (8) because it uses less than 2,000 pounds per year of welding rod (on a rolling 12-month basis), you must maintain records demonstrating your welding rod usage on a rolling 12-month basis.

(15) Your records must be maintained according to the requirements in paragraphs (c)(14)(i) through (iii) of this section.

(i) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1), "General Provisions." Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

(ii) As specified in §63.10(b)(1), "General Provisions," you must keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record.

(iii) You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record according to §63.10(b)(1), "General Provisions." You may keep the records off-site for the remaining 3 years.

**§ 63.11520 [Reserved]**

## Other Requirements and Information

### § 63.11521 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by EPA or a delegated authority such as your state, local, or tribal agency. If the EPA Administrator has delegated authority to your state, local, or tribal agency, then that agency, in addition to EPA, has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your state, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a state, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are retained by the EPA Administrator and are not transferred to the state, local, or tribal agency.

(c) The authorities that cannot be delegated to state, local, or tribal agencies are specified in paragraphs (c)(1) through (5) of this section.

(1) Approval of an alternative non-opacity emissions standard under §63.6(g), of the General Provisions of this part.

(2) Approval of an alternative opacity emissions standard under §63.6(h)(9), of the General Provisions of this part.

(3) Approval of a major change to test methods under §63.7(e)(2)(ii) and (f), of the General Provisions of this part. A “major change to test method” is defined in §63.90.

(4) Approval of a major change to monitoring under §63.8(f), of the General Provisions of this part. A “major change to monitoring” under is defined in §63.90.

(5) Approval of a major change to recordkeeping and reporting under §63.10(f), of the General Provisions of this part. A “major change to recordkeeping/reporting” is defined in §63.90.

### § 63.11522 What definitions apply to this subpart?

The terms used in this subpart are defined in the CAA; and in this section as follows:

*Adequate emission capture methods* are hoods, enclosures, or any other duct intake devices with ductwork, dampers, manifolds, plenums, or fans designed to draw greater than 85 percent of the airborne dust generated from the process into the control device.

*Capture system* means the collection of components used to capture gases and fumes released from one or more emissions points and then convey the captured gas stream to a control device or to the atmosphere. A capture system may include, but is not limited to, the following components as applicable to a given capture system design: duct intake devices, hoods, enclosures, ductwork, dampers, manifolds, plenums, and fans.

*Cartridge collector* means a type of control device that uses perforated metal cartridges containing a pleated paper or non-woven fibrous filter media to remove PM from a gas stream by sieving and other mechanisms. Cartridge collectors can be designed with single use cartridges, which are removed and disposed after reaching capacity, or continuous use cartridges, which typically are cleaned by means of a pulse-jet mechanism.

*Confined abrasive blasting enclosure* means an enclosure that includes a roof and at least two complete walls, with side curtains and ventilation as needed to insure that no air or PM exits the enclosure while dry abrasive blasting is performed. Apertures or slots may be present in the roof or walls to allow for mechanized transport of the blasted objects with overhead cranes, or cable and cord entry into the dry abrasive blasting chamber.

*Control device* means equipment installed on a process vent or exhaust system that reduces the quantity of a pollutant that is emitted to the air.

*Dry abrasive blasting* means cleaning, polishing, conditioning, removing or preparing a surface by propelling a stream of abrasive material with compressed air against the surface. Hydroblasting, wet abrasive blasting, or other abrasive blasting operations which employ liquids to reduce emissions are not dry abrasive blasting.

*Dry grinding and dry polishing with machines* means grinding or polishing without the use of lubricating oils or fluids in fixed or stationary machines. Hand grinding, hand polishing, and bench top dry grinding and dry polishing are not included under this definition.

*Fabric filter* means a type of control device used for collecting PM by filtering a process exhaust stream through a filter or filter media; a fabric filter is also known as a baghouse.

*Facility maintenance* means operations performed as part of the routine repair or renovation of process equipment, machinery, control equipment, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity. Facility maintenance also includes operations associated with the installation of new equipment or structures, and any processes as part of janitorial activities. Facility maintenance includes operations on stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. Facility maintenance also includes operations performed on mobile equipment, such as fork trucks, that are used in a manufacturing facility and which are maintained in that same facility. Facility maintenance does not include spray-applied coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters.

*Filtration control device* means a control device that utilizes a filter to reduce the emissions of MFHAP and other PM.

*Grinding* means a process performed on a workpiece to remove undesirable material from the surface or to remove burrs or sharp edges. Grinding is done using belts, disks, or wheels consisting of or covered with various abrasives.

*Machining* means dry metal turning, milling, drilling, boring, tapping, planing, broaching, sawing, cutting, shaving, shearing, threading, reaming, shaping, slotting, hobbing, and chamfering with machines. Shearing operations cut materials into a desired shape and size, while forming operations bend or conform materials into specific shapes. Cutting and shearing operations include punching, piercing, blanking, cutoff, parting, shearing and trimming. Forming operations include bending, forming, extruding, drawing, rolling, spinning, coining, and forging the metal. Processes specifically excluded are hand-held devices and any process employing fluids for lubrication or cooling.

*Material containing MFHAP* means a material containing one or more MFHAP. Any material that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), and contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material, is considered to be a material containing MFHAP.

*Metal fabrication and finishing HAP (MFHAP)* means any compound of the following metals: Cadmium, chromium, lead, manganese, or nickel, or any of these metals in the elemental form, with the exception of lead.

*Metal fabrication and finishing source categories* are limited to the nine metal fabrication and finishing source categories with the activities described in Table 1, "Description of Source Categories Affected by this Subpart." Metal fabrication or finishing operations means dry abrasive blasting, machining, spray painting, or welding in any one of the nine metal fabrication and finishing area source categories listed in Table 1, "Description of Source Categories Affected by this Subpart."

*Military munitions* means all ammunition products and components produced or used by or for the U.S. Department of Defense (DoD) or for the U.S. Armed Services for national defense and security, including military munitions under the control of the DoD, the U.S. Coast Guard, the National Nuclear Security Administration (NNSA), U.S. Department of Energy (DOE), and National Guard personnel. The term military munitions includes: Confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DoD components, including bulk explosives and chemical warfare agents, chemical munitions, biological weapons, rockets, guided and ballistic missiles, bombs, warheads, small arms ammunition, grenades, mines, torpedoes, depth

charges, cluster munitions and dispensers, demolition charges, nonnuclear components of nuclear weapons, wholly inert ammunition products, and all devices and components of any items listed in this definition.

*Paint* means a material applied to a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, coatings, sealants, liquid plastic coatings, caulks, inks, adhesives, and maskants. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances, or paper film or plastic film which may be pre-coated with an adhesive by the film manufacturer, are not considered paints for the purposes of this subpart.

*Polishing with machines* means an operation which removes fine excess metal from a surface to prepare the surface for more refined finishing procedures prior to plating or other processes. Polishing may also be employed to remove burrs on castings or stampings. Polishing is performed using hard-faced wheels constructed of muslin, canvas, felt or leather, and typically employs natural or artificial abrasives. Polishing performed by hand without machines or in bench top operations are not considered polishing with machines for the purposes of this subpart.

*Primarily engaged* means the manufacturing, fabricating, or forging of one or more products listed in one of the nine metal fabrication and finishing source category descriptions in Table 1, "Description of Source Categories Affected by this Subpart," where this production represents at least 50 percent of the production at a facility, and where production quantities are established by the volume, linear foot, square foot, or other value suited to the specific industry. The period used to determine production should be the previous continuous 12 months of operation. Facilities must document and retain their rationale for the determination that their facility is not "primarily engaged" pursuant to §63.10(b)(3) of the General Provisions.

*Quality control activities* means operations that meet all of the following criteria:

- (1) The activities are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.
- (2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are not sold and do not leave the facility.
- (3) The activities are not a normal part of the operation;
- (4) The activities do not involve fabrication of tools, equipment, machinery, and structures that comprise the infrastructure of the facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

*Responsible official* means responsible official as defined in 40 CFR 70.2.

*Spray-applied painting* means application of paints using a hand-held device that creates an atomized mist of paint and deposits the paint on a substrate. For the purposes of this subpart, spray-applied painting does not include the following materials or activities:

- (1) Paints applied from a hand-held device with a paint cup capacity that is less than 3.0 fluid ounces (89 cubic centimeters).
- (2) Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.
- (3) Painting operations that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; the application of paints that contain fillers that adversely affect atomization with HVLP spray guns, and the application of paints that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

(4) Thermal spray operations (also known as metallizing, flame spray, plasma arc spray, and electric arc spray, among other names) in which solid metallic or non-metallic material is heated to a molten or semi-molten state and propelled to the work piece or substrate by compressed air or other gas, where a bond is produced upon impact.

*Spray booth or spray room* means an enclosure with four sides and a roof where spray paint is prevented from leaving the booth during spraying by the enclosure. The roof of the spray booth or spray room may contain narrow slots for connecting the parts and products to overhead cranes, or for cord or cable entry into the spray booth or spray room.

*Tool or equipment repair* means equipment and devices used to repair or maintain process equipment or to prepare molds, dies, or other changeable elements of process equipment.

*Totally enclosed and unvented* means enclosed so that no air enters or leaves during operation.

*Totally enclosed and unvented dry abrasive blasting chamber* means a dry abrasive blasting enclosure which has no vents to the atmosphere, thus no emissions. A typical example of this sort of abrasive blasting enclosure is a small "glove box" enclosure, where the worker places their hands in openings or gloves that extend into the box and enable the worker to hold the objects as they are being blasted without allowing air and blast material to escape the box.

*Vented dry abrasive blasting* means dry abrasive blasting where the blast material is moved by air flow from within the chamber to outside the chamber into the atmosphere or into a control device.

*Welding* means a process which joins two metal parts by melting the parts at the joint and filling the space with molten metal.

*Welding rod containing MFHAP* means a welding rod that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), or that contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the welding rod.

**§ 63.11523 What General Provisions apply to this subpart?**

The provisions in 40 CFR part 63, subpart A, applicable to sources subject to §63.11514(a) are specified in Table 2 of this subpart.

**Table 1 to Subpart XXXXXX of Part 63—Description of Source Categories Affected by This Subpart**

<b>Metal fabrication and finishing source category</b>	<b>Description</b>
Electrical and Electronic Equipment Finishing Operations	Establishments primarily engaged in manufacturing motors and generators; and electrical machinery, equipment, and supplies, not elsewhere classified. The electrical machinery equipment and supplies industry sector of this source category includes establishments primarily engaged in high energy particle acceleration systems and equipment, electronic simulators, appliance and extension cords, bells and chimes, insect traps, and other electrical equipment and supplies not elsewhere classified. The motors and generators sector of this source category includes establishments primarily engaged in manufacturing electric motors (except engine starting motors) and power generators; motor generator sets; railway motors and control equipment; and motors,

<b>Metal fabrication and finishing source category</b>	<b>Description</b>
	generators and control equipment for gasoline, electric, and oil-electric buses and trucks.
Fabricated Metal Products	Establishments primarily engaged in manufacturing fabricated metal products, such as fire or burglary resistive steel safes and vaults and similar fire or burglary resistive products; and collapsible tubes of thin flexible metal. Also, establishments primarily engaged in manufacturing powder metallurgy products, metal boxes; metal ladders; metal household articles, such as ice cream freezers and ironing boards; and other fabricated metal products not elsewhere classified.
Fabricated Plate Work (Boiler Shops)	Establishments primarily engaged in manufacturing power marine boilers, pressure and nonpressure tanks, processing and storage vessels, heat exchangers, weldments and similar products.
Fabricated Structural Metal Manufacturing	Establishments primarily engaged in fabricating iron and steel or other metal for structural purposes, such as bridges, buildings, and sections for ships, boats, and barges.
Heating Equipment, except Electric	Establishments primarily engaged in manufacturing heating equipment, except electric and warm air furnaces, including gas, oil, and stoker coal fired equipment for the automatic utilization of gaseous, liquid, and solid fuels. Products produced in this source category include low-pressure heating (steam or hot water) boilers, fireplace inserts, domestic (steam or hot water) furnaces, domestic gas burners, gas room heaters, gas infrared heating units, combination gas-oil burners, oil or gas swimming pool heaters, heating apparatus (except electric or warm air), kerosene space heaters, gas fireplace logs, domestic and industrial oil burners, radiators (except electric), galvanized iron nonferrous metal range boilers, room heaters (except electric), coke and gas burning salamanders, liquid or gas solar energy collectors, solar heaters, space heaters (except electric), mechanical (domestic and industrial) stokers, wood and coal-burning stoves, domestic unit heaters (except electric), and wall heaters (except electric).
Industrial Machinery and Equipment Finishing Operations	Establishments primarily engaged in construction machinery manufacturing; oil and gas field machinery manufacturing; and pumps and pumping equipment manufacturing. The construction machinery manufacturing industry sector of this source category includes establishments primarily engaged in manufacturing heavy machinery and equipment of types used primarily by the construction industries, such as bulldozers; concrete mixers; cranes, except industrial plant overhead and truck-type cranes; dredging machinery; pavers; and power shovels. Also establishments primarily engaged in manufacturing forestry equipment

<b>Metal fabrication and finishing source category</b>	<b>Description</b>
	and certain specialized equipment, not elsewhere classified, similar to that used by the construction industries, such as elevating platforms, ship cranes, and capstans, aerial work platforms, and automobile wrecker hoists. The oil and gas field machinery manufacturing industry sector of this source category includes establishments primarily engaged in manufacturing machinery and equipment for use in oil and gas fields or for drilling water wells, including portable drilling rigs. The pumps and pumping equipment manufacturing sector of this source category includes establishments primarily engaged in manufacturing pumps and pumping equipment for general industrial, commercial, or household use, except fluid power pumps and motors. This category includes establishments primarily engaged in manufacturing domestic water and sump pumps.
Iron and Steel Forging	Establishments primarily engaged in the forging manufacturing process, where purchased iron and steel metal is pressed, pounded or squeezed under great pressure into high strength parts known as forgings. The forging process is different from the casting and foundry processes, as metal used to make forged parts is never melted and poured.
Primary Metals Products Manufacturing	Establishments primarily engaged in manufacturing products such as fabricated wire products (except springs) made from purchased wire. These facilities also manufacture steel balls; nonferrous metal brads and nails; nonferrous metal spikes, staples, and tacks; and other primary metals products not elsewhere classified.
Valves and Pipe Fittings	Establishments primarily engaged in manufacturing metal valves and pipe fittings; flanges; unions, with the exception of purchased pipes; and other valves and pipe fittings not elsewhere classified.

**Table 2—to Subpart XXXXXX of Part 63—Applicability of General Provisions to Metal Fabrication or Finishing Area Sources**

*Instructions for Table 2*—As required in §63.11523, “General Provisions Requirements,” you must meet each requirement in the following table that applies to you.

<b>Citation</b>	<b>Subject</b>
63.1 <sup>1</sup>	Applicability.
63.2	Definitions.
63.3	Units and abbreviations.
63.4	Prohibited activities.

<b>Citation</b>	<b>Subject</b>
<b>63.5</b>	Construction/reconstruction.
<b>63.6(a), (b)(1)–(b)(5), (c)(1), (c)(2), (c)(5), (g), (i), (j)</b>	Compliance with standards and maintenance requirements.
<b>63.9(a)–(d)</b>	Notification requirements.
<b>63.10(a), (b) except for (b)(2), (d)(1), (d)(4)</b>	Recordkeeping and reporting.
<b>63.12</b>	State authority and delegations.
<b>63.13</b>	Addresses of State air pollution control agencies and EPA regional offices.
<b>63.14</b>	Incorporation by reference.
<b>63.15</b>	Availability of information and confidentiality.
<b>63.16</b>	Performance track provisions.

<sup>1</sup>§63.11514(g), “Am I subject to this subpart?” exempts affected sources from the obligation to obtain title V operating permits.

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Registration Notice Only Change (NOC)

#### Source Description and Location

<b>Source Name:</b>	<b>Roll Forming Corporation</b>
<b>Source Location:</b>	<b>1205 North Access Road, Jeffersonville, IN 47130</b>
<b>County:</b>	<b>Clark (Jeffersonville Township)</b>
<b>SIC Code:</b>	<b>3499</b>
<b>Registration No.:</b>	<b>019-20332-00114</b>
<b>Registration Issuance Date:</b>	<b>January 12, 2005</b>
<b>Registration Notice Only Change No.:</b>	<b>019-28940-00114</b>
<b>Permit Reviewer:</b>	<b>Bruce Farrar</b>

On February 4, 2010, the Office of Air Quality (OAQ) received an application from Roll Forming Corporation related to a notice only change to an existing registration.

#### Existing Approvals

The source was issued Registration No. 019-20332-00114 on January 12, 2005. The source has since received the following approvals:

Registration Revision No. 019-20899-00114, issued on May 18, 2005.

#### County Attainment Status

The source is located in Clark County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective July 19, 2007, 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>Attainment effective October 23, 2001, for the 1-hour ozone standard for the Louisville area, including Clark County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standard (NAAQS) for purposes of 40 CFR Part 51, Subpart X\*. The 1-hour standard was revoked effective June 15, 2005.

Basic nonattainment designation effective federally April 5, 2005, for PM<sub>2.5</sub>.

#### (a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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 NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Clark County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM2.5**  
 Clark County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM2.5 emissions, and the effective date of these rules was July 15, 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**  
 Clark County has been classified as attainment or unclassifiable in Indiana for all other 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.

**Status of the Existing Source**

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

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Paint Booth	2.9	2.9	2.9	-	-	24.6	-	9.9	8.72 Glycol Ethers
Natural Gas Combustion	0.02	0.06	0.06	0.01	0.85	0.05	0.71	0.02	0.02 Hexane
Welding	1.1E-03	1.1E-03	1.1E-03	-	-	-	-	6.3E-05	
Regalvanizing Spray Unit	2.67	2.67	2.67	-	-	-	-	-	-
Laser Cutting	2.02	2.02	2.02	-	-	-	-	-	-
<b>Total PTE of the Entire Source</b>	<b>7.6</b>	<b>7.6</b>	<b>7.6</b>	<b>0.01</b>	<b>0.85</b>	<b>24.6</b>	<b>0.71</b>	<b>&lt;25</b>	<b>&lt;10</b>
Registration Levels	25	25	25	25	25	25	100	25	10
negl. = negligible These emissions are based upon OAQ permit NO.: 019-20899-00114, dated March 3, 2005.									

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Roll Forming Corporation on February 4, 2010 and March 2, 2010, relating to the construction and operation of two (2) double head miter saws, one (1) CNC saw, two (2) Nacco saws, and one (1) CNC operation.

The following is a list of the new emission units:

- (a) One (1) #1 double head miter saw, constructed in 2010, with a maximum capacity of 201 tons of

- rolled steel tubing per year, using an aqueous cutting coolant, and exhausting indoors.
- (b) One (1) #2 double head miter saw, constructed in 2010, with a maximum capacity of 201 tons of rolled steel tubing per year, using an aqueous cutting coolant and a cutting oil for lubrication, and exhausting indoors.
  - (c) One (1) CNC saw, constructed in 2010, with a maximum capacity of 402 tons of rolled steel tubing per year, using an aqueous cutting coolant, and exhausting indoors.
  - (d) One (1) 2 head Nacco dedicated saw, constructed in 2010, with a maximum capacity of 1956 of rolled steel tubing per year, using an aqueous cutting coolant.
  - (e) One (1) 1 head Nacco dedicated saw, constructed in 2010, with a maximum capacity of 1956 tons of rolled steel tubing per year, using an aqueous cutting coolant.
  - (f) One (1) CNC Machining center, constructed in 2010, with a maximum capacity of 1956 tons of rolled steel tubing per year, using an aqueous cutting coolant.

**Enforcement Issues**

There are no pending enforcement actions related to this revision.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – Registration Revision**

The following table is used to determine the appropriate permit level under 326 IAC 2-5.5-6. This table reflects the PTE before controls of the proposed revision.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM <sup>1</sup>	PM10* <sup>1</sup>	PM2.5 <sup>1</sup>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
#1 Double Head Miter Saw	0.0004	0.0004	0.0004	-	-	-	-	-	-
#2 Double Head Miter Saw	0.0004	0.0004	0.0004	-	-	0.03	-	-	-
CNC Saw	0.0005	0.0005	0.0005	-	-	0.07	-	-	-
1 Head Nacco Saw	0.0004	0.0004	0.0004	-	-	-	-	-	-
2 Head Nacco Saw	0.0004	0.0004	0.0004	-	-	-	-	-	-
CNC Machining Center	0.00034	0.00034	0.00034	-	-	0.03	-	-	-
Welding (line 5448)	1.18E-03	1.18E-03	1.18E-03					negl.	negl.
Total PTE of Proposed Revision	0.00362	0.00362	0.00362	-	-	0.136	-	-	-

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM <sup>1</sup>	PM10 <sup>*1</sup>	PM2.5 <sup>1</sup>	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Worst Single HAP
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". 1. Assume PM = PM10 and PM2.5									

The addition of these units to the registration is considered a notice-only change, since the potential emissions of regulated criteria pollutants and hazardous air pollutants are less than the ranges specified in 326 IAC 2-5.5-6(d)(10) and 326 IAC 2-5.5-6(d)(12), respectively (see attached appendix A for calculations). The uncontrolled/unlimited potential to emit of the entire source will continue to be within the threshold levels specified in 326 IAC 2-5.5-1(b)(1). There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this notice-only change.

**PTE of the Entire Source After Issuance of the Notice Only Change**

The table below summarizes the potential to emit of the entire source after issuance of this notice only change, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source with the Notice Only Change (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Worst Single HAP
Paint Booth	2.9	2.9	2.9	-	-	24.6	-	<del>9.9</del> <b>1.18</b>	<sup>0.72</sup> Glycol Ethers <b>0.9</b> Chromium
Natural Gas Combustion	0.02	0.06	0.06	0.01	0.85	0.05	<del>0.7</del> 1	0.02	0.02 Hexane
Welding	1.1E-03	1.1E-03	1.1E-03	-	-	-	-	6.3E-05	
Regalvanizing Spray Unit	2.67	2.67	2.67	-	-	-	-	-	-
Laser Cutting	2.02	2.02	2.02	-	-	-	-	-	-
#1 Double Head Miter Saw	0.0004	0.0004	0.0004	-	-	-	-	-	-
#2 Double Head Miter Saw	0.0004	0.0004	0.0004	-	-	0.03	-	-	-
CNC Saw	0.0005	0.0005	0.0005	-	-	0.07	-	-	-
#1 Head Nacco Saw	0.0004	0.0004	0.0004	-	-	-	-	-	-
#2 Head Nacco Saw	0.0004	0.0004	0.0004	-	-	-	-	-	-
CNC Machining Center	0.00034	0.00034	0.00034	-	-	0.03	-	-	-
Welding (line 5448)	1.18E-03	1.18E-03	1.18E-03					negl.	negl.

Process/ Emission Unit	Potential To Emit of the Entire Source with the Notice Only Change (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Worst Single HAP
<b>Total PTE of the Entire Source</b>	<b>7.6</b>	<b>7.6</b>	<b>7.6</b>	<b>0.01</b>	<b>0.85</b>	<b>24.62 24.76</b>	<b>0.7 1</b>	<b>&lt;25</b>	<b>&lt;10</b>
Registration Levels	25	25	25	25	25	25	10 0	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".  
 α - As of November 29, 2004, the EPA has amended "the list of hazardous air pollutants (HAP) contained in section 112(b)(1) of the Clean Air Act (CAA) by removing the compound ethylene glycol monobutyl ether (EGBE) (2-Butoxyethanol) (Chemical Abstract Service (CAS) No. 111-76-2) from the group of glycol ethers" as described in the Federal Register (FRL-7841-8).

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Notice Only Change (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs	Worst Single HAP
Paint Booth	2.9	2.9	2.9	-	-	24.6	-	1.18	0.9 Chromium
Natural Gas Combustion	0.02	0.06	0.06	0.01	0.85	0.05	0.71	0.02	0.02 Hexane
Welding	1.1E-03	1.1E-03	1.1E-03	-	-	-	-	6.3E-05	
Regalvanizing Spray Unit	2.67	2.67	2.67	-	-	-	-	-	-
Laser Cutting	2.02	2.02	2.02	-	-	-	-	-	-
#1 Double Head Miter Saw	0.0004	0.0004	0.0004	-	-	-	-	-	-
#2 Double Head Miter Saw	0.0004	0.0004	0.0004	-	-	0.03	-	-	-
CNC Saw	0.0005	0.0005	0.0005	-	-	0.07	-	-	-
1 Head Nacco Saw	0.0004	0.0004	0.0004	-	-	-	-	-	-
2 Head Nacco Saw	0.0004	0.0004	0.0004	-	-	-	-	-	-
CNC Machining Center	0.00034	0.00034	0.00034	-	-	0.03	-	-	-
Welding (line 5448)	1.18E-03	1.18E-03	1.18E-03					negl.	negl.
<b>Total PTE of the Entire Source</b>	<b>7.6</b>	<b>7.6</b>	<b>7.6</b>	<b>0.01</b>	<b>0.85</b>	<b>24.76</b>	<b>0.71</b>	<b>&lt;25</b>	<b>&lt;10</b>
Registration Levels	25	25	25	25	25	25	100	25	10

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Notice Only Change (tons/year)								
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
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) This revision will not change the registration status of the source, because the uncontrolled/unlimited potential to emit of pollutants from the entire source will still be within the ranges listed in 326 IAC 2-5.5-1(b)(1) and the PTE of all other regulated criteria pollutants will still be less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source will still be subject to the provisions of 326 IAC 2-5.5 (Registrations).
- (b) This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be 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**

The federal rule applicability for this revision is as follows:

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63.11169, Subpart HHHHHH (6H), are not included for this proposed revision, since this source is an affected source under 40 CFR 63, Subpart XXXXXX (6X).
- (c) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63, Subpart XXXXXX (6X), because the source has a SIC code of 3449 and the Vac-U-Paint surface coating system emits a metal fabrication or finishing metal HAP (MFHAP) greater than 0.1 percent by weight of Chromium. The MIG welding station is not an affect source because its MFHAP are less than 0.1 percent.

Applicable portions of the NESHAP are the following:

- (1) 40 CFR 63.11514 (a), (b) (4), (c)
- (2) 40 CFR 63.11515
- (3) 40 CFR 63.11516 (d)
- (4) 40 CFR 63.11517
- (5) 40 CFR 63.11519
- (6) 40 CFR 63.11521
- (7) 40 CFR 63.11522
- (8) 40 CFR 63.11523

- (9) Table 1
- (10) Table 2

Pursuant to 40 CFR 63.11515(a), the Permittee shall comply with the requirements of 40 CFR 63, Subpart XXXXXX by July 25, 2011.

Nonapplicable portions of the NESHAP will not be included in the permit.

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the source except as otherwise specified in 40 CFR 63, Subpart XXXXXX (6X).

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

#### Compliance Assurance Monitoring (CAM)

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

<b>State Rule Applicability Determination</b>
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The state rules applicable to the existing emission units at this source will not change as a result of this revision.

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-5.5 (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 proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a

- continuous opacity monitor) in a six (6) hour period.
- (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.

#### #1 Double Head Miter Saw

- (f) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2(b)(14) (Particulate Emission Limitations for Manufacturing Processes), the source is not subject to this rule because the manufacturing processes has potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.
- (g) 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County)  
The source is located in Clark County, but is not specifically listed in 326 IAC 6.5-2. Pursuant to 326 IAC 6.5-1-1(a), the potential particulate emissions are less than one hundred (100) tons per year and the actual emissions are less ten (10) tons per year, therefore the requirements of 326 6.5-1-2(a) do not apply.
- (h) There are no 326 IAC 8 Rules that are applicable to the unit.

#### #2 Double Head Miter Saw

- (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2(b)(14) (Particulate Emission Limitations for Manufacturing Processes), the source is not subject to this rule because the manufacturing processes has potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.
- (j) 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County)  
The source is located in Clark County, but is not specifically listed in 326 IAC 6.5-2. Pursuant to 326 IAC 6.5-1-1(a), the potential particulate emissions are less than one hundred (100) tons per year and the actual emissions are less ten (10) tons per year, therefore the requirements of 326 6.5-1-2(a) do not apply.
- (k) There are no 326 IAC 8 Rules that are applicable to the unit.

#### CNC Saw

- (l) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2(b)(14) (Particulate Emission Limitations for Manufacturing Processes), the source is not subject to this rule because the manufacturing processes has potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.
- (m) 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County)  
The source is located in Clark County, but is not specifically listed in 326 IAC 6.5-2. Pursuant to 326 IAC 6.5-1-1(a), the potential particulate emissions are less than one hundred (100) tons per year and the actual emissions are less ten (10) tons per year, therefore the requirements of 326 6.5-1-2(a) do not apply.
- (n) There are no 326 IAC 8 Rules that are applicable to the unit.

#### #1 Head Nacco Saw

- (o) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2(b)(14) (Particulate Emission Limitations for Manufacturing Processes), the source is not subject to this rule because the manufacturing processes has potential

emissions less than five hundred fifty-one thousandths (0.551) pound per hour.

- (p) 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County)  
The source is located in Clark County, but is not specifically listed in 326 IAC 6.5-2. Pursuant to 326 IAC 6.5-1-1(a), the potential particulate emissions are less than one hundred (100) tons per year and the actual emissions are less ten (10) tons per year, therefore the requirements of 326 6.5-1-2(a) do not apply.
- (q) There are no 326 IAC 8 Rules that are applicable to the unit.

#### #2 Head Nacco Saw

- (r) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2(b)(14) (Particulate Emission Limitations for Manufacturing Processes), the source is not subject to this rule because the manufacturing processes has potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.
- (s) 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County)  
The source is located in Clark County, but is not specifically listed in 326 IAC 6.5-2. Pursuant to 326 IAC 6.5-1-1(a), the potential particulate emissions are less than one hundred (100) tons per year and the actual emissions are less ten (10) tons per year, therefore the requirements of 326 6.5-1-2(a) do not apply.
- (t) There are no 326 IAC 8 Rules that are applicable to the unit.

#### CNC Machining Center

- (u) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2(b)(14) (Particulate Emission Limitations for Manufacturing Processes), the source is not subject to this rule because the manufacturing processes has potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour.
- (v) 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County)  
The source is located in Clark County, but is not specifically listed in 326 IAC 6.5-2. Pursuant to 326 IAC 6.5-1-1(a), the potential particulate emissions are less than one hundred (100) tons per year and the actual emissions are less ten (10) tons per year, therefore the requirements of 326 6.5-1-2(a) do not apply.
- (w) There are no 326 IAC 8 Rules that are applicable to the unit.

<b>Proposed Changes</b>
-------------------------

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

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

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

- (a) One (1) Vac-U-Paint surface coating system on process line 5443, designated as Unit 3, constructed in the Spring of 2003, that applies paint to metal parts using an air atomizing spray coater, with a maximum capacity of 23,803 tons of rolled steel per year and 71 tons of paint per year, with overspray controlled by vacuum extraction through template openings, and with extracted air filtered then exhausted through Stack 1 [**Under 40 CFR 63, Subpart XXXXXX, this is an affected unit**].

\*\*\*

- (c) One (1) cold cleaning degreaser used to perform non-halogenated organic solvent degreasing (mineral spirits) of parts and/or tools in process line 5410, constructed in 2003, utilizing 23 gallons of solvent per year. The cold cleaner is an offline system, batch type, which uses immersion, and is equipped with drain and remote reservoir.

\*\*\*

- (f) One (1) Dritech mechanical cut-off saw on process line 5443, constructed in the Spring of 2003, where cutting coolant continuously floods the machining interface, with a maximum capacity of 23,803 tons of rolled steel per year;
- ~~(g) One (1) natural gas fired heater on process line 5443, designated as Unit 6, constructed in the Spring of 2003, rated at 0.22 MMBtu/hr, exhausting to Stack 3;~~

\*\*\*

- (l) One (1) Dreistern hydraulic cut-off unit on process line 5410, constructed in 2003, with a maximum capacity of 32,861 tons of rolled steel per year, ~~utilizing a cutting oil for lubrication~~ **where a cutting coolant continuously floods the machine interface.**
- (m) Insignificant activities associated with use of lubricating oils, hydraulic oils, machining oils, and/or machining fluids (including coolants) associated with process lines 5443 ~~and~~, 5410 **and 5448.**

\*\*\*

- (o) **One (1) #1 double head miter saw, constructed in 2010, with a maximum capacity of 201 tons of rolled steel tubing per year, using an aqueous cutting coolant.**
- (p) **One (1) #2 double head miter saw, constructed in 2010, with a maximum capacity of 201 tons of rolled steel tubing per year, using an aqueous cutting coolant and a cutting oil for lubrication.**
- (q) **One (1) CNC saw, constructed in 2010, with a maximum capacity of 402 tons of rolled steel tubing per year, using an aqueous cutting coolant.**
- (r) **One (1) #1 head Nacco dedicated saw, constructed in 2010, with a maximum capacity of 1956 of rolled steel tubing per year, using an aqueous cutting coolant.**
- (s) **One (1) #2 head Nacco dedicated saw, constructed in 2010, with a maximum capacity of 1956 tons of rolled steel tubing per year, using an aqueous cutting coolant.**
- (t) **One (1) CNC Machining center, constructed in 2010, with a maximum capacity of 1956 tons of rolled steel tubing per year, using an aqueous cutting coolant.**
- (u) **One (1) metal inert gas (MIG) welding station on process line 5448, constructed in 2010, with a maximum capacity of 3,912 tons of rolled steel per year and a maximum annual wire usage rate of 394 pounds of wire per year (GMAW Wire Types E70S and E70S-6).**

(b) Upon further review, IDEM, OAQ has decided to make the following changes to the permit.

Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

- (1) Several of IDEM's branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the registration. References to "Compliance Data Section" and "Compliance Branch" have been changed to "Compliance and Enforcement Branch". The registration has been revised as follows:

~~Compliance Data Section~~ **Compliance and Enforcement Branch**  
~~Compliance Branch~~ **Compliance and Enforcement Branch**

- (2) IDEM, OAQ has determined that the Vac-U-Paint surface coating system is not subject to IAC 326 6-3-2(e), but subject to 326 IAC 6-3-2(c) because the Vac-U-Paint meets the definition of a surface coating operation, pursuant to 326 IAC 6-3-1.5(5). Section D.1 has been revised as follows:

## 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 (1) Vac-U-Paint surface coating system on process line 5443, designated as Unit 3, constructed in the Spring of 2003, that applies paint to metal parts using an air atomizing spray coater, with a maximum capacity of 23,803 tons of rolled steel per year and 71 tons of paint per year, with overspray controlled by vacuum extraction through template openings, and with extracted air filtered then exhausted through Stack 1; **[Under 40 CFR 63, Subpart XXXXXX, this is an affected unit].**
- (b) One (1) rolled steel reglvanizing spray unit on process line 5410, constructed in August 2004, where zinc is applied to rolled steel by galvanization at a maximum throughput 32,861 tons of steel per year, using zinc wire at a maximum usage rate of 8,215 pounds of zinc wire per year.

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

- ~~(a) Pursuant to 326 IAC 6-3-2, the particulate matter emission from the Vac-U-Paint surface coating system shall not exceed the pound per hour emission rate established as E in the following formula:~~

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

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

- ~~(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate from the Vac-U-Paint surface coating system on process line 5443 shall be controlled by vacuum extraction through template openings and the Permittee shall operate the control device in accordance with manufacturer's specifications.~~

~~If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such an observation:~~

- ~~(1) Repair control device so that no overspray is visible detectable at the exhaust or accumulates on the ground.~~
- ~~(2) Operate equipment so that no overspray is visible detectable at the exhaust or accumulates on the ground.~~

~~If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.~~

- ~~(c) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emission from the regalanization spray unit shall not exceed 9.94 pound per hour when operating at a maximum process weight rate of 32,861 tons of steel per year. This PM emission limit shall be established as E in the following formula:~~

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

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

#### **D.1.2 Particulate [326 IAC 6-3-2(d)]**

- (a) Particulate from the Vac-U-Paint surface coating system shall be controlled by a dry particulate filter and the Permittee shall operate the control device in accordance with manufacturer's specifications.**
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:**
  - (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.**
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.**
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.**

#### **D.1.3 Particulate [326 IAC 6-3-2]**

**Pursuant to 326 IAC 6-3-2, the particulate matter (PM) emission from the regalanization spray unit shall not exceed 9.94 pound per hour when operating at a maximum process weight rate of 32,861 tons of steel per year. This PM emission limit shall be established as E in the following formula:**

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

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

All subsequent conditions have been renumbered.

- (3) *IDEM, OAQ has determined that the cold cleaning degreaser is subject to IAC 326 8-3-8 because the degreaser is located in Clark county. The registration is revised as follows:*

#### **D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]**

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaning Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

##### **D.2.3 Record Keeping Requirements**

To document compliance with Condition D.2.2, the Permittee shall maintain the following records for each purchase of solvent. These records shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

- (a) The name and address of the solvent supplier.
  - (b) The date of purchase.
  - (c) The type of solvent.
  - (d) The volume of each unit of solvent.
  - (e) The total volume of the solvent.
  - (f) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (4) *IDEM, OAQ, has determined that Roll Forming Corporation is subject to the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63, Subpart XXXXXX (6X) because engages in fabricated metal products production. Section E.1 has been added as shown below and a copy of the NESHAP has been added to the end of the permit as Attachment A.*

#### **SECTION E.1**

#### **OPERATION CONDITIONS**

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

- (a) One (1) Vac-U-Paint surface coating system on process line 5443, designated as Unit 3, constructed in the Spring of 2003, that applies paint to metal parts using an air atomizing spray coater, with a maximum capacity of 23,803 tons of rolled steel per year and 71 tons of paint per year, with overspray controlled by vacuum extraction through template openings, and with extracted air filtered then exhausted through Stack 1. [Under 40 CFR 63, Subpart XXXXXX, this is an affected unit];

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

**E.3.1 General Provisions Relating to NESHAP XXXXXX [326 IAC 20-1] [40 CFR Part 63, Subpart A]**

(a) Pursuant to 40 CFR 63.11523, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in 40 CFR Part 63, Subpart XXXXXX in accordance with the schedule in 40 CFR 63 Subpart XXXXXX.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

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

**E.3.2 Nine Metal Fabrication and Finishing Source Categories NESHAP [40 CFR Part 63, Subpart XXXXXX]**

The Permittee which engages in fabricated metal products production shall comply with the following provisions of 40 CFR 63, Subpart XXXXXX (included as Attachment A of this permit), with a compliance date of July 25, 2011:

- (1) 40 CFR 63.11514 (a), (b) (4), (c)
- (2) 40 CFR 63.11515
- (3) 40 CFR 63.11516 (d)
- (4) 40 CFR 63.11517
- (5) 40 CFR 63.11519
- (6) 40 CFR 63.11521
- (7) 40 CFR 63.11522
- (8) 40 CFR 63.11523
- (9) Table 1
- (10) Table 2

**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 February 4, 2010.

The construction and operation of this notice only change shall be subject to the conditions of the attached proposed Registration Notice Only Change No. 019-28940-00114. The staff recommends to the Commissioner that this Registration Notice Only Change 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: Emissions Calculations  
Summary**

**Company Name: Roll Forming Corporation**  
**Address City IN Zip: 1205 North Access Road, Jeffersonville, IN 47130**  
**Permit Number: 019-28940-00114**  
**Plt ID: 019-00114**  
**Reviewer: Bruce Farrar**  
**Date: March 2, 2010**

Emission Units	Uncontrolled PTE (tons/year)								
	Pollutant								
	PM	PM10	PM2.5	SO2	VOC	CO	NOX	Single HAP	Total HAP
Total Source <sup>1</sup>	7.60	7.60	7.60	0.01	24.62	0.71	0.85	<10	<25
#1 Double Head Miter Saw	0.0004 <sup>α</sup>	0.0004 <sup>α</sup>	0.0004 <sup>α</sup>	-	-	-	-		
#2 Double Head Miter Saw	0.0004 <sup>α</sup>	0.0004 <sup>α</sup>	0.0004 <sup>α</sup>	-	0.035	-	-		
CNC Saw	0.0005 <sup>α</sup>	0.0005 <sup>α</sup>	0.0005 <sup>α</sup>	-	0.067	-	-		
#1 Nacco Saw	0.0004 <sup>α</sup>	0.0004 <sup>α</sup>	0.0004 <sup>α</sup>						
#2 Nacco Saw	0.0004 <sup>α</sup>	0.0004 <sup>α</sup>	0.0004 <sup>α</sup>						
CNC Machine Center	0.00034 <sup>α</sup>	0.00034 <sup>α</sup>	0.00034 <sup>α</sup>		0.035				
Welding (line 5448)	1.18E-03	1.18E-03	1.18E-03					negl.	negl.
<b>Total</b>	<b>7.60</b>	<b>7.60</b>	<b>7.6</b>	<b>0.01</b>	<b>24.76</b>	<b>0.71</b>	<b>0.85</b>	<b>&lt;10</b>	<b>&lt;25</b>

Because of the low PTE amounts, testing will not be required for emission factor verification.

α. Assume PM = PM10 and PM2.5

**Appendix A: Emissions Calculations  
Particulate Matter From Saws**

**Company Name:** Roll Forming Corporation  
**Address City IN Zip:** 1205 North Access Road, Jeffersonville, IN 47130  
**Permit Number:** 019-28940-00114  
**Plt ID:** 019-00114  
**Reviewer:** Bruce Farrar  
**Date:** March 2, 2009

Emission Unit	Blade Thickness (inches)	Density of Steel (lbs/in <sup>3</sup> )	Cuts per hour	Steel Cut in <sup>3</sup>	Chips Generated (lbs/hr)	Emission Factor*	Uncontrolled Emissions	
						PM (lbs/ton)	PM <sup>1</sup> (lbs/hr)	PM <sup>1</sup> (tpy)
#1 Double Head Miter Saw	0.12	0.283	80	17.61	47.843	0.004	9.33E-05	0.0004
#2 Double Head Miter Saw	0.12	0.283	80	17.61	47.843	0.004	9.33E-05	0.0004
CNC Saw	0.14	0.283	80	17.61	55.817	0.004	1.09E-04	0.0005
1 Head Nacco Saw	0.12	0.283	80	17.61	47.830	0.004	9.33E-05	0.0004
2 Head Nacco Saw	0.12	0.283	80	17.61	47.830	0.004	9.33E-05	0.0004
CNC Machine Center		0.283	62.5	2.25	39.8	0.004	7.761E-05	0.00034

**Totals**

**0.0006    0.0025**

\* Emission Factor from OAQ Permit Number 097-26845-00135, dated January 21, 2009. Permit #26845 (Geiger & Peters) and Roll Forming Corp. share the 1st two digit in their SIC code (34 - Fabricated metal products). Both sources use saws to cut metal. All Roll Forming Corp's saws use an aqueous cutting coolant to continuously flood the machining interface. Because of the low PTE amounts, testing will not be required for emission factor verification.

1. Assume PM = PM10 and PM2.5

**Methodology**

volume of Steel Tube = 17.61 in<sup>3</sup> (outer cylinder 169.64 in - inner cylinder 152.03 in)  
 lbs Chips generated/hr = cuts/hour \* (steel cut/in<sup>3</sup> \* blade thickness) \* (Density steel/in<sup>3</sup>)  
 PM lbs/hr = lbs chips/hr \* emission factor  
 PM tons/yr = (lbs chips/hr \* emission factor) \* 8760 hr/yr \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
Particulate Matter  
VOC from Coolant from Saws**

**Company Name: Roll Forming Corporation  
Address City IN Zip: 1205 North Access Road, Jeffersonville, IN 47130  
Permit Number: 019-28940-00114  
Pit ID: 019-00114  
Reviewer: Bruce Farrar  
Date: March 2, 2010**

Material	Density (Lb/Gal)	Gal of Mat. (gal/year)	Percent VOC per Gallon	pounds VOC per gallon	Potential VOC lb/hr	Potential VOC ton/year
Valcool VNT 700 <sup>1</sup>	8.59	155.00	10.00%	0.86	0.015	0.067
Syntilo 9918 <sup>2</sup>	8.93	155.00	5.00%	0.45	0.008	0.035
Syntilo 9918 <sup>3</sup>	8.93	155.00	5.00%	0.45	0.008	0.035

**State Potential Emissions**

**0.03**

**0.136**

1. Associated with CNC Saw
2. Associated with #2 Double Head Miter Saw
3. Associated with CNC Machining Center

**METHODOLOGY**

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/year) \* (1 yr/8760 hrs)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/year) \* (1 ton/2000 lbs)

**Appendix A: Emissions Calculations  
Particulate Matter  
Welding (Line 5448)**

**Company Name:** Roll Forming Corporation  
**Address City IN Zip:** 1205 North Access Road, Jeffersonville, IN 47130  
**Permit Number:** 019-28940-00114  
**Plt ID:** 019-00114  
**Reviewer:** Bruce Farrar  
**Date:** March 2, 2010

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)					EMISSIONS (lbs/hr)					HAPS (lbs/hr)	
			PM = PM10	Mn	Ni	Cr	Co	PM = PM10	Mn	Ni	Cr	Co		
WELDING														
GMAW (ER 70S)	1	0.05	5.40E-03	3.20E-04	1.00E-06	1.00E-06	1.00E-06	2.70E-04	1.60E-05	5.00E-08	5.00E-08	5.00E-08	1.62E-05	
<b>EMISSION TOTALS</b>														
Potential Emissions lbs/hr								2.70E-04					1.62E-05	
Potential Emissions lbs/day								0.01					3.88E-04	
Potential Emissions tons/year								1.18E-03					7.07E-05	

METHODOLOGY

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

\*\*Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick r

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.



# 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:** Tim Teegarden  
Rolling Forming Corp.  
1205 North Access Road  
Jeffersonville, IN 47130

**DATE:** March 31, 2010

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

**SUBJECT:** Final Decision  
Notice-Only Change  
019-28940-00114

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:  
Kathleen Wilson - Linebach Funkhouser, 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	GHOTOPP 3/31/2010 Roll Forming Corp 019-28940-00114 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		Tim Teegarden Roll Forming Corp 1205 North Access Rd Jeffersonville IN 47130 (Source CAATS) via confirmed delivery										
2		Ms. Rhonda England 17213 Persimmon Run Rd Borden IN 47106-8604 (Affected Party)										
3		Ms. Betty Hislip Silver Lakes Trailer Pk 13131 Sunnybrook Dr Memphis IN 47143-9672 (Affected Party)										
4		Mrs. Sandy Banet 514 Haddox Rd Henryville IN 47126 (Affected Party)										
5		Jeffersonville City Council and Mayors Office 500 Quarter Master Jeffersonville IN 47130 (Local Official)										
6		Mr. Robert Bottom Paddlewheel Alliance P.O. Box 35531 Louisville KY 40232-5531 (Affected Party)										
7		Clark County Board of Commissioners 501 E. Court Avenue Jeffersonville IN 47130 (Local Official)										
8		Clark County Health Department 1320 Duncan Avenue Jeffersonville IN 47130-3723 (Health Department)										
9		Kathleen Wilson Linebach Funkhouser, Inc. 114 Fairfax Ave Louisville KY 40207 (Consultant)										
10												
11												
12												
13												
14												
15												

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.
8			