



# 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: August 6, 2010

RE: Emery Winslow Scale / 167-29345-00122

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

## Notice of Decision: Approval - Registration

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

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

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

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

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

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

Enclosures  
FN-REGIS.dot 1/2/08



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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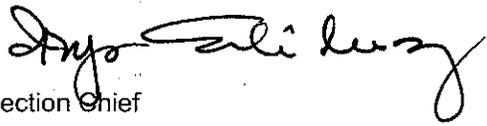
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## REGISTRATION OFFICE OF AIR QUALITY

**Emery Winslow Scale  
4530 North 25th Street  
Terre Haute, Indiana 47805**

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. R167-29345-00122	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 6, 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 Industrial Scale Manufacturing operation.

Source Address:	4530 North 25th Street, Terre Haute, Indiana 47805
General Source Phone Number:	(812) 466-5265
SIC Code:	3596
County Location:	Vigo
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

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

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

- (a) One (1) paint room utilizing an airless air assist spray gun, constructed in 1956, with a maximum capacity 0.225 of metal parts per hour, using dry filters as control, and exhausting to three (3) 24" diameter stacks.
- (b) One (1) Powrmatic Model TE-41 natural gas-fired furnace with a heat input of 2.2 MMBtu/hr.
- (c) Five (5) Solartronics natural gas-fired radiant heat tubes, each with a heat input of 0.125 MMBtu/hr.
- (d) Eight (8) Solartronics natural gas-fired heaters, each with a heat input of 85 Btu/hr.
- (e) Seven (7) metal inert gas (MIG) welders.
- (f) Four (4) tungsten inert gas (TIG) welders.
- (g) One (1) MAAP gas welder.

## **SECTION B GENERAL CONDITIONS**

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

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Terms in this registration shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

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

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Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

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

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

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

### **B.4 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. 167-29345-00122 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 registration 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 Registrant may extend the date an additional ninety (90) days provided the Registrant 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

The Registrant shall implement the PMPs.

- (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 Registrant 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 or 40 CFR Part 63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such OMM 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.2 Fugitive Dust Emissions [326 IAC 6-4]**

The Registrant shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

## SECTION D.1

## EMMISIONS UNITS OPERATION CONDITIONS

### Emissions Unit Description:

- (a) One (1) paint room utilizing an airless air assist spray gun, constructed in 1956, with a maximum capacity 0.225 of metal parts per hour, using dry filters as control, and exhausting to three (3) 24" diameter stacks.

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

### Emission Limitations and Standards

#### D.1.1 Particulate [326 IAC 6.5-1]

Pursuant 326 6.5-1-2(a), 326 IAC 6.5-1 particulate matter emissions from the paint room shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

#### D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for this facility and its control device. Section B - Preventive Maintenance Plan contains the Registrant's obligation with regard to the preventive maintenance plan required by this condition.

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

#### D.1.3 Monitoring Requirements

The dry filters shall be in operation and control emissions at all times that the paint room is in operation in order to comply with this limit.

**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>	Emery Winslow Scale
<b>Address:</b>	4530 North 25th Street
<b>City:</b>	Terre Haute, Indiana 47805
<b>Phone Number:</b>	(812) 466-5265
<b>Registration No.:</b>	167-29345-00122

I hereby certify that Emery Winslow Scale is :

still in operation.

I hereby certify that Emery Winslow Scale is :

no longer in operation.

in compliance with the requirements of Registration No. 167-29345-00122.

not in compliance with the requirements of Registration No. 167-29345-00122.

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

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

<b>Noncompliance:</b>

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Minor Source Operating Permit (MSOP) Transitioning to a Registration

#### Source Description and Location

<b>Source Name:</b>	<b>Emery Winslow Scale Co., Inc.</b>
<b>Source Location:</b>	<b>4530 North 25<sup>th</sup> Street, Terre Haute, IN 47805</b>
<b>County:</b>	<b>Vigo</b>
<b>SIC Code:</b>	<b>3596</b>
<b>Registration No.:</b>	<b>R167-29345-00122</b>
<b>Permit Reviewer:</b>	<b>Bruce Farrar</b>

On June 8, 2010, the Office of Air Quality (OAQ) received an application from Emery Winslow Scale Co., Inc. related to the transition of a Minor Source Operating Permit (MSOP) to a Registration due to changes in the coatings used in the paint room.

#### Existing Approvals

The source has been operating under MSOP No. M164-11852-00122, issued on October 6, 2006. Due to this application, the source is transitioning from a MSOP to a Registration.

#### County Attainment Status

The source is located in Vigo 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 February 6, 2006, for the Terre Haute area, including Vigo County, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.

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

Unclassifiable or attainment effective April 5, 2005, for 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. Vigo 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) Vigo County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub>

emissions. These rules became effective on July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions until 326 IAC 2-2 is revised.

- (c) Other Criteria Pollutants  
Vigo 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 2-5.5 (Registrations) applicability.

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

- (a) One (1) paint room utilizing an airless air assist spray gun, constructed in 1956, with a maximum capacity 0.225 of metal parts per hour, using dry filters as control, and exhausting to three (3) 24" diameter stacks.
- (b) One (1) Powmatic Model TE-41 natural gas-fired furnace with a heat input of 2.2 MMBtu/hr.
- (c) Five (5) Solartronics natural gas-fired radiant heat tubes, each with a heat input of 0.125 MMBtu/hr.
- (d) Eight (8) Solartronics natural gas-fired heaters, each with a heat input of 85 Btu/hr.
- (e) Seven (7) metal inert gas (MIG) welders.
- (f) Four (4) tungsten inert gas (TIG) welders.
- (g) One (1) MAAP gas welder.

### **Enforcement Issues**

There are no pending enforcement actions related to this source.

### **Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

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

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

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)								
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP
Paint Booth	14.5	14.5	14.5	-	-	21.31	-	6.42	4.29 Toluene
Welding	0.48	0.48	0.48	-	-	-	-	0.02	Negl.
Combustion	0.02	0.09	0.09	0.01	1.24	0.07	1.04	0.02	Negl.
<b>Total PTE of Entire Source</b>	<b>15.00</b>	<b>15.07</b>	<b>15.07</b>	<b>0.01</b>	<b>1.24</b>	<b>21.38</b>	<b>1.04</b>	<b>6.46</b>	<b>-</b>
Exemptions Levels	5	5	5	10	10	5	25	25	10
Registration Levels	25	25	25	25	25	25	100	25	10
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".									

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of all regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.5-1(b)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.5 (Registrations). A Registration will be issued.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

**Federal Rule Applicability Determination**

New Source Performance Standards (NSPS)

- (a) The requirements of the National Emission Standards for Halogenated Solvent Cleaning, 40 CFR 63.460, Subpart T (326 IAC 20-6), are not included in the Registration, since this source does not use halogenated solvent cleaners.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of National Emission Standard for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks, 40 CFR 63.3080, Subpart IIII (326 IAC 20-85) are not included in this Registration, because this source does not apply surface coating materials to automobiles or light-duty trucks.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63.3880, Subpart MMMM (4M)) are not included in this Registration, because this source is not a major source for HAPs.

- (e) 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 Registration, because the source does not perform paint stripping using paint strippers that contain methylene chloride (MeCl), performs autobody refinishing operations, or has spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63.11514, Subpart XXXXXX (6X)), are not included for this Registration, because this source's SIC is not listed.
- (j) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the Registration.

#### Compliance Assurance Monitoring (CAM)

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

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

- (a) 326 IAC 2-5.1-2 (Registrations)  
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4. This source is not located in the part of Vigo County subject to the more stringent 30% opacity limitation.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

#### Paint Room

- (g) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-2(c)(3) (Particulate Emission Limitations for Manufacturing Processes), the source is not subject to this rule because 326 IAC 6.5-1-2 applies.
- (h) 326 IAC 6.5-1 (Particulate Matter Limitations Except Lake County)  
The source is located in Vigo County, but is not specifically listed in 326 IAC 6.5-9. Pursuant to 326 IAC 6.5-1-1(a), the potential particulate emissions are less than one hundred (100) tons per year, however, the actual emissions are over ten (10) tons per year, therefore the requirements of 326 6.5-1-2(a) apply. Particulate matter emissions from the paint booth shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).  
  
The dry filters shall be in operation and control emissions at all times that the paint booth is in operation in order to comply with this limit.
- (i) 326 IAC 9-1-6 (New facilities; General Reduction Requirements)  
The source has potential emissions of VOC less than 25 tons per year, therefore the paint room is not subject to 326 8-1-6.
- (j) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)  
The paint room performs a metal coating process, has actual VOC emissions greater than 15 pounds per day and the source is under the Standard Industrial Classification Code of major group #35. However, the source was constructed before July 1, 1990; therefore, the paint room is not subject to 326 IAC 8-2-9.
- (k) There are no other 326 IAC 8 Rules that are applicable to the unit, because the VOC PTE is less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

#### **Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on June 8, 2010.

The operation of this source shall be subject to the conditions of the attached proposed Registration No. 167-29345-00122. The staff recommends to the Commissioner that this Registration be approved.

#### **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Bruce Farrar at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5401 or toll free at 1-800-451-6027 extension 4-5401.

- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.in.gov/idem](http://www.in.gov/idem)

**Appendix A: Emissions Calculations  
Summary**

**Company Name:** Emery Winslow Scale  
**Address City IN Zip:** 4530 North 25th Street, Terre Haute, Indiana 47805  
**Permit Number:** R167-29345-00122  
**Plt ID:** 167-00122  
**Reviewer:** Bruce Farrar  
**Date:** June 8, 2010

**Paint Booth    Welding    Combustion    Total**

PM*	14.50	0.48	0.02	15.00
PM10*	14.50	0.48	0.09	15.07
PM2.5	14.50	0.48	0.09	15.07
SO2	-	-	0.01	0.01
NOx	-	-	1.24	1.24
VOC	21.31	-	0.07	21.38
CO	-	-	1.04	1.04
Combined HAPs	6.42	0.02	0.02	6.46
Single HAP	4.29	1.53E-02	0.02	
HAP name	Toluene	Magnesium	Hexane	

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

**Company Name: Emery Winslow Scale  
Address City IN Zip: 4530 North 25th Street, Terre Haute, Indiana 47805  
Permit Number: R167-29345-00122  
Plt ID: 167-00122  
Reviewer: Bruce Farrar  
Date: June 8, 2010**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
F77XXL4562-1407	8.0	60.00%	0.0%	60.0%	0.0%	40.00%	1.00	0.225	4.82	4.82	1.08	26.02	4.75	1.90	12.05	40%
E61RC21	9.7	39.60%	0.0%	39.6%	0.0%	60.40%	3.63	0.225	3.85	3.85	3.14	75.45	13.77	12.60	6.37	40%
Toluene	7.8	100.00%	0.0%	100.0%	0.0%	25.19%	0.36	0.225	7.80	7.80	0.64	15.29	2.79	0.00	30.96	40%

**State Potential Emissions**

**4.86                      116.76                      21.31                      14.50**

**NOTE:** Toluene is used as a thinner with E61RC21 paint with a mix of 1 part Toluene per 10 parts paint.

**NOTE:** AP-42, Table 4.2.2.11-1. lists a minimum transfer efficiency for this type of operation at 40%. Therefore the worst case transfer efficiency figure was used for these calculations.

**METHODOLOGY**

Unit per hour is based on

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

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

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

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

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

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

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

Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations**

**HAP Emission Calculations**

**Company Name:** Emery Winslow Scale  
**Address City IN Zip:** 4530 North 25th Street, Terre Haute, Indiana 47805  
**Permit Number:** R167-29345-00122  
**Pit ID:** 167-00122  
**Permit Reviewer:** Bruce Farrar  
**Date:** June 8, 2010

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Weight % Naphthalene	Weight % Hexane	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)
F77XXL4562-1407	8.03	1.00	0.225	18.00%	19.00%	3.00%	0.10%	0.00%	1.42	1.50	0.24	0.01	0.00
E61RC21	9.72	3.63	0.225	1.00%	0.00%	0.30%	0.00%	0.00%	0.35	0.00	0.10	0.00	0.00
Toluene	7.8	0.36	0.225	0.00%	100.00%	0.00%	0.00%	0.00%	0.00	2.79	0.00	0.00	0.00

Total State Potential Emissions

**1.77      4.29      0.34      0.01      0.00**

**NOTE:** Toluene is used as a thinner with E61RC21 paint with a mix of 1 part Toluene per 10 part paint.

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

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

**Company Name: Emery Winslow Scale  
Address City IN Zip: 4530 North 25th Street, Terre Haute, Indiana 47805  
Permit Number: R167-29345-00122  
Pit ID: 167-00122  
Reviewer: Bruce Farrar  
Date: June 8, 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	PM = PM10	Mn	Ni	Cr	
WELDING												
Metal Inert Gas (MIG)(carbon steel)	7	1		0.0055	0.0005			0.039	0.004	0.000	0	0.004
Tungsten Inert Gas (TIG)(carbon steel)	4	0.5		0.0055	0.0005			0.011	0.001	0.000	0	0.001
FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene (MAPP Gas)	1	1	5	0.1622	0.0005	0.0001	0.0003	0.049	0.000	0.000	0.000	0.000
Plasma**	1	0.5	45	0.0039				0.011	0.000	0.000	0.000	0.000
<b>EMISSION TOTALS</b>												
Potential Emissions lbs/hr								0.11				4.52E-03
Potential Emissions lbs/day								2.61				0.11
Potential Emissions tons/year								0.48				0.02

**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" t

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

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

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

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Small Industrial Boiler**

**Company Name: Emery Winslow Scale**  
**Address City IN Zip: 4530 North 25th Street, Terre Haute, Indiana 47805**  
**Permit Number: R167-29345-00122**  
**Plt ID: 167-00122**  
**Reviewer: Bruce Farrar**  
**Date: June 8, 2010**

Heat Input Capacity  
MMBtu/hr  
2.2  
0.625  
0.00068  
**2.8**

Potential Throughput  
MMCF/yr

TE-41 furnace, rated at 2.2MMBtu/hr  
5 Solartronics Radiant Heat Tubes, rated at 0.125 MMBtu/hr, each  
8 Solartronics KS-2 heaters, rated at 85 Btu/hr, each

24.8

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.02	0.09	0.01	1.24	0.07	1.04

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

See page 6 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Small Industrial Boiler**

**HAPs Emissions**

**Company Name: Emery Winslow Scale**

**Address City IN Zip: 4530 North 25th Street, Terre Haute, Indiana 47805**

**Permit Number: R167-29345-00122**

**Plt ID: 167-00122**

**Reviewer: Bruce Farrar**

**Date: June 8, 2010**

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.599E-05	1.485E-05	9.282E-04	2.228E-02	4.208E-05

	HAPs - Metals				
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	6.188E-06	1.361E-05	1.733E-05	4.703E-06	2.599E-05

Methodology is the same as page 5.

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



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

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

TO: James Evinger  
Emery Winslow Scale Co  
4530 N 25<sup>th</sup> St  
Terre Haute, IN 47805

DATE: August 6, 2010

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

SUBJECT: Final Decision  
Registration  
167-29345-00122

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:  
OAQ Permits Branch Interested Parties List

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

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

IDEM Staff	DPABST 8/6/2010 Emery Winslow Scale Co. 167-29345-00122 (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		

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2		Mr. Charles L. Berger Attorney Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)									
3		Vigo County Board of Commissioners County Annex, 121 Oak Street Terre Haute IN 47807 (Local Official)									
4		Vigo County Health Department 147 Oak Street Terre Haute IN 47807 (Health Department)									
5		J.P. Roehm PO Box 303 Clinton IN 47842 (Affected Party)									
6		Deb Reeves Vigo County Air Pollution Control 121 Oak Terre Haute IN 47807 (Local Official)									
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