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

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: February 16, 2011

RE: T & S Equipment / 151-29813-00053

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

Notice of Decision: Approval - Registration

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

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

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

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

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

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

Enclosures
FN-REGIS.dot 1/2/08

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REGISTRATION
OFFICE OF AIR QUALITY

T & S Equipment Corporation
900 Growth Parkway
Angola, IN 46703

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. R151-29813-00053	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: February 16, 2011

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

The Registrant owns and operates a stationary fabricated metal parts - machine, weld, paint and assembly operations.

Source Address:	900 Growth Parkway, Angola, IN 46703
General Source Phone Number:	(260) 665-7586
SIC Code:	3499, 3999
County Location:	Steuben County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Registration

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) spray booth, identified as V1, using a HVLP spray gun, with a capacity of 20 metal units per hour (maximum of 98 lbs/hr), controlled by dry filters and exhausting to stack V1.

(b) One (1) closed loop powder coating operation, identified as powder coat, consisting of:

(1) One (1) five stage washer, equipped with a 3.5 MMBtu/hr natural gas-fired burner:

(A) Stage 1 alkaline cleaning using city water and Fremont 465 at 3% concentration heated to 140°F (contains no VOC or HAPs).

(B) Stage 2 and stage 3 rinse using city water.

(C) Stage 4 conversion coating using city water and Lean Coat 400 at 0.5% concentration (contains no VOC or HAPs).

(D) Stage 5 rinse using city water.

(2) One (1) natural gas-fired dry off oven with a maximum heat capacity of 2.5 MMBtu/hr.

(3) One environmental room with two (2) powder coating lines consisting of one Vortech Booth controlled by a cyclone and cartridge collection system and venting inside the building and two Diamond booths controlled by a cartridge collection system venting inside the building. The collection systems are considered integral to the process.

(4) One (1) natural gas-fired cure oven with a maximum heat capacity of 3.5 MMBtu/hr.

(5) One (1) natural gas-fired burn off oven, with a maximum heat capacity of 0.8 MMBtu/hr.

(c) Miscellaneous welding and machining operations consisting of:

(1) Twenty-five (27) steel MIG welders and two (2) dual welders with a maximum consumption of 3.5 lbs/hr of wire each; and

(2) Five (5) aluminum MIG welders with a maximum consumption of 2.0 lbs/hr of wire each.

(3) Two (2) stick welder.

(4) One (1) spot welder.

(d) Cutting Operations consisting of:

(1) Two (2) Plasma cutters cutting 0.75 inch steel at a maximum rate of 14.00 inches per hour.

(2) Six (6) gas cutting torches cutting 0.75 inch of metal at a maximum rate of 11.7 inches per hour.

(e) Two (2) Radial Saw.

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

(1) Three (3) natural gas-fired forced air furnaces, identified as F-1, F-2, and TS-1 with a maximum heat capacity of 2.2 MMBtu/hr, each;

(2) Four (4) natural gas-fired heaters, identified as TS-2, with a maximum heat input capacity of 0.040 MMBtu/hr, each;

(3) Two (2) natural gas-fired tribunes, identified as TS-3, with a maximum heat input capacity of 0.95 MMBtu/hr, each;

(4) One (1) natural gas-fired infra-red heating tube, with a maximum heat capacity of 0.20 MMBtu/hr;

(5) Two (2) natural gas-fired furnaces, with a maximum heat capacity of 0.3 MMBtu/hr, each;

(6) One (1) natural gas-fired furnace, with a maximum heat capacity of 0.25 MMBtu/hr;

(7) Three (3) natural gas-fired water heaters, with a maximum heat capacity of 0.04 MMBtu/hr, each; and

(g) Three (3) natural gas fueled forklifts.

SECTION B GENERAL CONDITIONS

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

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]

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]

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]

(a) All terms and conditions of permits established prior to Registration No. 151-29813-00053 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)]

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)]

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)]

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]

(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 OPERATION CONDITIONS

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

(a) One (1) spray booth, identified as V1, using a HVLP spray gun, with a capacity of 20 metal units per hour (maximum of 98 lbs/hr), controlled by dry filters and exhausting to stack V1.

(b) One (1) closed loop powder coating operation, identified as powder coat, consisting of:

(1) One (1) five stage washer, equipped with a 3.5 MMBtu/hr natural gas-fired burner:

(A) Stage 1 alkaline cleaning using city water and Fremont 465 at 3% concentration heated to 140°F (contains no VOC or HAPs).

(B) Stage 2 and stage 3 rinse using city water.

(C) Stage 4 conversion coating using city water and Lean Coat 400 at 0.5% concentration (contains no VOC or HAPs).

(D) Stage 5 rinse using city water.

(2) One (1) natural gas-fired dry off oven with a maximum heat capacity of 2.5 MMBtu/hr.

(3) One environmental room with two (2) powder coating lines consisting of one Vortech Booth controlled by a cyclone and cartridge collection system and venting inside the building and two Diamond booths controlled by a cartridge collection system venting inside the building. The collection systems are considered integral to the process.

(4) One (1) natural gas-fired cure oven with a maximum heat capacity of 3.5 MMBtu/hr.

(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 Particulate [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6-3-2(d), the spray booth, identified as V1, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, subject to the following:

(a) 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 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 changes 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.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the closed loop powder coating operation shall not exceed 0.87 pounds per hour when operating at a process weight rate of 200 pounds per hour.

The above pounds per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to 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

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

Within ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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 Determination Requirements [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

D.1.4 Particulate Control

In order to comply with Condition D.1.2, the cyclone and cartridge collection system for particulate control shall be in operation and control emissions from closed loop powder coating operation at all times the closed loop powder coating operation is in operation.

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

To document the compliance status with Condition D.1.1, the Permittee shall maintain records of any actions taken if overspray is visibly detected**.**

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).

Company Name:	T & S Equipment Corporation
Address:	900 Growth Parkway
City:	Angola, IN 46703
Phone Number:	(260) 665-7586
Registration No.:	R151-29813-00053

I hereby certify that T & S Equipment Corporation is :
☐ still in operation.
☐ no longer in operation.

I hereby certify that T & S Equipment Corporation is :
☐ in compliance with the requirements of Registration No. 151-29813-00053.
☐ not in compliance with the requirements of Registration No. 151-29813-00053

Authorized Individual (typed):
Title:
Signature:
Phone Number:
Date:

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.

Noncompliance:

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for an Exemption Transitioning to a Registration

Source Description and Location

Source Name:	**T & S Equipment Company**
Source Location:	**900 Growth Parkway, Angola, IN 46703**
County:	**Steuben**
SIC Code:	**3499, 3999**
Registration (or Exemption) No.:	**151-29813-00053**
Permit Reviewer:	**Bruce Farrar**

On October 21, 2010, the Office of Air Quality (OAQ) received an application from T & S Equipment Company related to the construction and operation of new emission units and the continued operation of an existing fabricated metal parts - machine, weld, paint and assembly operations.

Source Definition

Vestil Manufacturing Corporation (151-00035) is owned by Ralph Trine, who formerly held an ownership interest in T & S Equipment Company (151-00053). The two plants are approximately one mile apart. IDEM, OAQ has examined whether these two plants are part of the same major source. The term "major source" is defined at 326 IAC 2-7-1(22). In order for the two plants to be considered one major source they must meet all three of the following criteria:

(1) the plants must be under common ownership or common control;

(2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,

(3) the plants must be located on contiguous or adjacent properties.

Ralph Trine is the sole owner of Vestil. T & S is owned by several shareholders, many of whom are related to Mr. Trine. Since Mr. Trine does not have an ownership interest in T & S, there is no common ownership. IDEM's nonrule policy document, NRPD 005, sets out two tests to determine if common control exists in situations where there is no common ownership:

1. *The two-pronged test*
   Determine if one source is an auxiliary activity
   a. directly serving the purpose of another primary activity and,
   b. the owner or operator of the primary activity has a major role in the day-to-day operations of the auxiliary activity.

2. *But/for test*
   The auxiliary activity would not exist absent the needs of the primary activity. If all or a majority of the output of the auxiliary activity is consumed by the primary activity the but/for test is satisfied.

Neither plant serves the purpose of the other plant. Neither plant has any role in the day-to-day operations of the other. None of the output of either plant is consumed by the other. It either plant discontinued operations, the other plant's operations would not be affected. IDEM, OAQ has determined that neither of

the common control tests is met. Since there is no common ownership or common control, the first element of the definition is not met.

Vestil and T & S have the same two-digit SIC code 34, for the major group Fabricated Metal Products, Except Machinery and Transportation Equipment.

A plant is considered a support facility if at least 50% of its output is dedicated to the other plant. Neither plant sends any output to the other, so there is no support relationship. Since the two plants have the same two-digit SIC Code meet the second element of the definition.

The two plants are located approximately one mile apart. There are no physical connections between the two plants. The plants do not share employees. None of the work at either plant supports the other plant. Therefore, the two plants are not adjacent. The two plants do not meet all three of the elements of the major source definition. Therefore IDEM, OAQ finds that the two plants are not part of the same major source. This source determination was effective from Exemption 151-29091-00053 issued June 17, 2010.

Existing Approvals

The source has been operating under Exemption No. 151-29813-00053, issued on June 17, 2010.

County Attainment Status

The source is located in Steuben County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

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

(a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Steuben County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM2.5
Steuben County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants
Steuben 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 2-1.1-3 (Exemptions) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by T & S Equipment Company on October 21, 2010, relating to the addition of MIG welding stations, two (2) plasma cutters, and changes in combustion units. The source will transition from an exemption to a registration level due to the addition of these emission units.

The source consists of the following existing emission units:

(a) One (1) spray booth, identified as V1, using a HVLP spray gun, with a capacity of 20 metal units per hour (maximum of 98 lbs/hr), controlled by dry filters and exhausting to stack V1.

(b) One (1) closed loop powder coating operation, identified as powder coat, consisting of:

(1) One (1) five stage washer, equipped with a 3.5 MMBtu/hr natural gas-fired burner:

(A) Stage 1 alkaline cleaning using city water and Fremont 465 at 3% concentration heated to 140°F (contains no VOC or HAPs).

(B) Stage 2 and stage 3 rinse using city water.

(C) Stage 4 conversion coating using city water and Lean Coat 400 at 0.5% concentration (contains no VOC or HAPs).

(D) Stage 5 rinse using city water.

(2) One (1) natural gas-fired dry off oven with a maximum heat capacity of 2.5 MMBtu/hr.

(3) One environmental room with two (2) powder coating lines consisting of one Vortech Booth controlled by a cyclone and cartridge collection system and venting inside the building and two Diamond booths controlled by a cartridge collection system venting inside the building. The collection systems are considered integral to the process.

(4) One (1) natural gas-fired cure oven with a maximum heat capacity of 3.5 MMBtu/hr.

(5) One (1) natural gas-fired burn off oven, with a maximum heat capacity of 0.8 MMBtu/hr.

(c) Miscellaneous welding and machining operations consisting of:

(1) Twenty-five (27) steel MIG welders and two (2) dual welders with a maximum consumption of 3.5 lbs/hr of wire each; and

(2) Five (5) aluminum MIG welders with a maximum consumption of 2.0 lbs/hr of wire each.

(3) Two (2) stick welder.
(4) One (1) spot welder.

(d) Cutting Operations consisting of:

(1) Two (2) Plasma cutters cutting 0.75 inch steel at a maximum rate of 14.00 inches per hour.

(2) Six (6) gas cutting torches cutting 0.75 inch of metal at a maximum rate of 11.7 inches per hour.

(e) Two (2) Radial Saw.

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

(1) Three (3) natural gas-fired forced air furnaces, identified as F-1, F-2, and TS-1 with a maximum heat capacity of 2.2 MMBtu/hr, each;

(2) Four (4) natural gas-fired heaters, identified as TS-2, with a maximum heat input capacity of 0.040 MMBtu/hr, each;

(3) Two (2) natural gas-fired tribunes, identified as TS-3, with a maximum heat input capacity of 0.95 MMBtu/hr, each;

(4) One (1) natural gas-fired infra-red heating tube, with a maximum heat capacity of 0.20 MMBtu/hr;

(5) Two (2) natural gas-fired furnaces, with a maximum heat capacity of 0.300 MMBtu/hr, each;

(6) One (1) natural gas-fired furnace, with a maximum heat capacity of 0.25 MMBtu/hr;

(7) Three (3) natural gas-fired water heaters, with a maximum heat capacity of 0.04 MMBtu/hr, each; and

(g) Three (3) natural gas fueled forklifts.

"Integral Part of the Process" Determination

The applicant has submitted the following information on February 3, 2011 to justify why the cyclone and cartridge filters should be considered an integral part of the closed loop powder coating operation:

(a) The capital cost of closed loop powder coating operation was $716,150 in 1999.

(b) The operation and maintenance cost is approximately $27,400 per year.

(c) Powder coating recovered from the closed loop powder coating operation is 39,900 pounds per year. The cost of the powder coating is between $2.70 and $3.14 per pound. Assuming the low cost of $2.70 per pound, the minimum annual savings is $107,730 per year.

(d) The cyclone collect used powder coating and directs it back to reclaim hopper for immediate use if needed.

IDEM, OAQ has evaluated the information submitted and agrees that the cyclone and cartridge filters

should be considered an integral part of the closed loop powder coating operation. This determination is based on the fact that the cyclone and cartridge filters are used to collect used powder coating that is directed back to a reclaim hopper. In addition, the applicant has a direct savings of approximately $107,000 per year versus an operational cost of $27,000 per year. Therefore, the permitting level will be determined using the potential to emit after the cyclone and cartridge filters. Operating conditions in the proposed permit will specify that this cyclone and cartridge filters shall operate at all times when the closed loop powder coating operation is in operation.

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_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Spray Booth (V1)	0.4	0.4	0.4	-	-	1.08	-	0.08	0.08 Dibutylphthalate
Closed Loop Powder Coating Operation	1.64	1.64	1.64	-	-	-	-	-	-
Welding/Plasma cutting	7.21	7.21	7.21	-	-	-	-	0.10	0.10 Magnesium
Combustion	0.08	0.33	0.33	0.03	4.31	0.24	3.62	0.081	0.077 Hexane
Total PTE of Entire Source	**9.33**	**9.58**	**9.58**	**0.02**	**3.33**	**1.26**	**2.80**	**<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 within the ranges listed in 326 IAC 2-5.1-2(a)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.1-2(a)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registrations). A Registration will be issued.

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

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) The requirements of the Standards Of Performance For New Stationary Sources for Stationary Gas Turbines are not included in this proposed revision, because the source's turbines has a peak load less than 10 million Btu per hour.

(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 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 for this proposed revision, because this source is not a major source for HAPs.

(d) 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 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).

(e) 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, Subpart XXXXXX (6X)), are not included for this proposed revision, because the facility is not one of the nine source categories listed in 40 CFR 63.11514(a).

(f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the source:

(a) 326 IAC 2-5.1-2 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.

(b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.

(c) 326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.

(d) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

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

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

(f) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the source does not have potential fugitive particulate emissions greater than 25 tons per year. Therefore, 326 IAC 6-5 does not apply.

Spray Booth, V1

(g) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The spray booth, identified as V1, does not use dip, roll, flow or brush coating and uses more than five (5) gallons of paint per day, therefore, 326 IAC 6-3-2 applies.

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.

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.

(h) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)
The spray booth V1 performs the metal coating process and the source is under the SIC major group 37 and the source was constructed after July 1, 1990. However, the coating booth has potential and actual VOC emissions less than 15 pounds per day. Therefore, spray booth V1 is not subject to 326 IAC 8-2-9.

(i) There are no other 326 IAC 8 Rules that are applicable to the unit.

Closed Loop Powder Coating Operation

(j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the allowable particulate emission rate from the closed loop powder coating operation shall not exceed 0.87 pounds per hour when operating at a process weight rate of 200 pounds per hour.

The pounds per hour limitations were calculated with the following equation:

Interpolation of the data for the process weight rate up to 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

The integral cyclone and cartridge filters shall be in operation at all times the closed loop powder coating operation is in operation in order to comply with this limit.

(k) 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)
The source is not subject to the requirements of 326 IAC 8-2-9, because the source does not have any VOC emissions from its powder coating spray booths operation.

(l) 326 IAC 8-1 (Volatile Organic Compound Rules)
The stage 1 alkaline cleaning using Fremont 465 is exempt from the requirements of 326 8-1 because it does not use a VOC or HAP containing compound.

(m) 326 IAC 8-1 (Volatile Organic Compound Rules)
The Stage 4 conversion coating using Lean Coat 400 is exempt from the requirements of 326 8-1 because it does not use a VOC or HAP containing compound.

(n) There are no other 326 IAC 8 Rules that are applicable to the unit.

Welding Operations

(o) (326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(9), the welding operations are exempt from the requirements of 326 IAC 6-3-2 because they consume less than 625 pounds of rod or wire per day.

Plasma Cutting Operations

(p) (326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(10), the plasma cutting operation is exempt from the requirements of 326 IAC 6-3-2 because the total cutting is less than 3,400 inches per hour of stock one (1) inch thick.

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 October 21, 2010.

The operation of this source shall be subject to the conditions of the attached proposed Registration No. 151-29813-00053. The staff recommends to the Commissioner that this Registration be approved.

This Registration supersedes Exemption No.: 151-29091-00053, issued on June 17, 2010.

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

Appendix A: Emissions Calculations
Summary Sheet

Company Name: T & S Equipment Company
Address City IN Zip: 900 Growth Parkway, Angola IN 46703
Permit Number: 151-29813-00053
Plt ID: 151-00053
Reviewer: Bruce Farrar
Date: October 21, 2010

	Unlimited Potential Emissions									
	Pollutant									
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Single HAP	
Emission Units										
Spray Booth (V1)	0.40	0.40	0.40	-	-	1.08	-	0.08	0.08	Dibutylphthalate
Closed Loop Powder Coating Operation	1.64	1.64	1.64	-	-	-	-	-	-	-
Welding/Plasma	7.09	7.09	7.09	-	-	-	-	0.095	0.095	Magnesium
Combustion	0.08	0.33	0.33	0.03	4.31	0.24	3.62	0.081	0.077	Hexane
TOTAL	**9.21**	**9.46**	**9.46**	**0.03**	**4.31**	**1.31**	**3.62**	**<25**	**<10**	

Total emissions based on rated capacity at 8,760 hours per year.

Appendix A: Emissions Calculations
VOC and Particulate
From Spray Booth (V1)

Company Name: T & S Equipment Company
Address City IN Zip: 900 Growth Parkway, Angola IN 46703
Permit Number: 151-29813-00053
Plt ID: 151-00053
Reviewer: Bruce Farrar
Date: October 21, 2010

Material	Density (Lb/Gal)	Weight % Volatile (H20 & 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
TRE-KOTE Acrylic	9.1	60.00%	49.2%	10.8%	52.4%	36.08%	0.01250	20.000	2.06	0.98	0.25	5.90	1.08	0.40	2.72	90%
State Potential Emissions			**Add worst case coating to all solvents**								**0.25**	**5.90**	**1.08**	**0.40**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

TRE-KOTE Acrylic is only coating used. No clean-up solvent in application

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: **T & S Equipment Company**
Address City IN Zip: **900 Growth Parkway, Angola IN 46703**
Permit Number: **151-29813-00053**
Plt ID: **151-00053**
Reviewer: **Bruce Farrar**
Date: **October 21, 2010**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Dibutylphthalate	Dibutylphthalate (ton/yr)
Dibutylphthalate	9.07	0.01250	20.000	0.83%	0.08

Total State Potential Emissions **0.08**

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
Particulate
From Closed Loop Powder Coating Operation

Company Name: T & S Equipment Company
Address City IN Zip: 900 Growth Parkway, Angola IN 46703
Permit Number: 151-29813-00053
Plt ID: 151-00053
Reviewer: Bruce Farrar
Date: October 21, 2010

Material	Pounds per hour	Particulate Potential (pounds per hour)	Particulate Potential (ton/yr)	Transfer Efficiency
Powder Coating	25.00	0.38	1.64	70%

METHODOLOGY Cartridge Filters Control Efficiency: 95.00%

PM/PM10/PM2.5 Potential pounds per hour = (pounds per hour coating) * (1- transfer efficiency) * (1-control efficiency)
PM/PM10/PM2.5 Potential tons per year = (pounds per hour coating) * (1- transfer efficiency) * (1-control efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: T & S Equipment Company
Address City IN Zip: 900 Growth Parkway, Angola IN 46703
Permit Number: 151-29813-00053
Plt ID: 151-00053
Reviewer: Bruce Farrar
Date: October 21, 2010

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
WELDING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Metal Inert Gas (MIG)(carbon steel)	27	3.5		0.004	0.0002			0.378	0.019	0.000	0	0.019
Metal Inert Gas (MIG)(aluminum)	5	2		0.0723				0.723	0.000	0.000	0	0.000
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
FLAME CUTTING				PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene	6	0.75	11.7	0.1622	0.0005	0.0001	0.0003	0.512	0.002	0.000	0.001	0.003
Plasma**	2	0.75	14	0.0039				0.005	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								1.62				0.022
Potential Emissions lbs/day								38.84				0.52
Potential Emissions tons/year								7.09				0.095

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 rather than 1 inch, and the maximum metal thickness is not used in calculting the emissions.

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

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

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

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

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

Company Name: **T & S Equipment Company**
Address City IN Zip: **900 Growth Parkway, Angola IN 46703**
Permit Number: **151-29813-00053**
Plt ID: **151-00053**
Reviewer: **Bruce Farrar**
Date: **October 21, 2010**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Unit Description
6.6	57.8	Heaters, F1, F2, and TS-1 each at 2.2 MMBtu/hr
0.16	1.4	Four Heaters, TS-2, @0.04MMBtu/hr, each
0.2	1.8	One heater @ 200,000 Btu/hr
0.6	5.3	Two heaters @ 300,000 Btu/hr, each
0.25	2.2	One heater @ 250,000 Btu/hr
0.12	1.1	Three Water Heaters @40,000 Btu/hr, each
1.9	16.6	Two Turbines, TS-3, @ 0.95 MMBtu/hr, each
3.5	30.7	Cure Oven @3.5 MMBtu/hr
2.5	21.9	Dry-off Oven @ 2.5 MMBtu/hr
3.5	30.7	Washer Stage 1 @ 3.5 MMBtu/hr
0.8	7.0	Burn-off Oven @ 0.8 MMBtu/hr
20.13	86.1	

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.08	0.33	0.03	4.31	0.24	3.62

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

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 7 for HAPs emissions calculations.

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

Company Name: T & S Equipment Company
Address City IN Zip: 900 Growth Parkway, Angola IN 46703
Permit Number: 151-29813-00053
Plt ID: 151-00053
Reviewer: Bruce Farrar
Date: October 21, 2010

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	9.042E-05	5.167E-05	3.229E-03	7.750E-02	1.464E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.153E-05	4.736E-05	6.028E-05	1.636E-05	9.042E-05

Methodology is the same as page 6.

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

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

TO: Vincent Torres
T & S Equipment Company
POB 496
Angola, IN 46703

DATE: February 16, 2011

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

SUBJECT: Final Decision
Registration
151-29813-00053

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:
Barry Trine, Responsible Official
Teri Schenk, Consultant
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.

Mail Code 61-53

IDEM Staff	DPABST 2/15/2011 T & S Equipment Company 151-29813-00053 (Final)		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	Type of Mail: **CERTIFICATE OF MAILING ONLY**

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		Vincent Torres T & S Equipment Company PO Box 496 Angola IN 46703 (Source CAATS) (CONFIRM DELIVERY)									
2		Barry Trine VP T & S Equipment Company PO Box 496 Angola IN 46703 *(RO CAATS)*									
3		Steuben County Board of Commissioners 317 S Wayne Suite 2H Angola IN 46703 *(Local Official)*									
4		Steuben County Health Department 317 S. Wayne St, Community Center Suite 3-A Angola IN 46703-1938 *(Health Department)*									
5		Mr. Steve Christman NISWMD 2320 W 800 S, P.O. Box 370 Ashley IN 46705 *(Affected Party)*									
6		Mr. Diane Hanson 490 E 300 N Angola IN 46703 *(Affected Party)*									
7		Niann Lautzenhiser 660 LN 210 Hamilton LK Hamilton IN 46742 *(Affected Party)*									
8		Ms. Teri Schenk Environmental Solutions, LLC PO Box 349 Elkhart IN 46517 *(Consultant)*									
9		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 *(Affected Party)*									
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 ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.

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