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

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a New Source Review and Federally Enforceable State Operating Permit (FESOP)

for Aerofab, Division of Tube Processing Corporation in Marion County

Permit No. F097 30090 00011

The Indiana Department of Environmental Management (IDEM) has received an application from Aerofab, Division of Tube Processing Corporation located at 604 East LeGrande Avenue, Indianapolis, Indiana 46203 for a MSOP transitioning to a FESOP because of added new equipment. If approved by IDEM's Office of Air Quality (OAQ), this proposed permit would allow Aerofab, Division of Tube Processing Corporation to operate a stationary Steel tubing/Fabrication Repair operation.

The applicant intends to construct and operate new equipment that will emit air pollutants, therefore the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed or removed. The potential to emit of any regulated pollutants and hazardous air pollutants will continue to be limited to less than the TV and/or PSD major threshold levels, respectively. IDEM has reviewed this application, and has developed preliminary findings, consisting of a draft permit and several supporting documents, that would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings are available at:

Indianapolis-Marion County Public Library
Shelby Branch
2502 Shelby Street
Indianapolis, IN 46203

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number F097-30090-00011 in all correspondence.

Comments should be sent to:

Bruce Farrar
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-5401
Or dial directly: (317) 234-5401
E-mail: bfarrar

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor or noise. For such issues, please contact your local officials.

For additional information about air permits and how you can participate, please see IDEM's **Guide for Citizen Participation** and **Permit Guide** on the Internet at: www.idem.in.gov.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.
If you have any questions please contact Bruce Farrar of my staff at the above address.

Alfred C. Dumaual for
Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

bf

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DRAFT

New Source Review and Federally Enforceable State Operating Permit
OFFICE OF AIR QUALITY

Aerofab, Division of Tube Processing Corporation
604 East LeGrande Avenue
Indianapolis, Indiana 46203

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-8-11.1, applicable to those conditions

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Operation Permit No.: F097-30090-00011	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

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SECTION A SOURCE SUMMARY

This permit 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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee 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 Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary Steel tubing/Fabrication Repair.

Source Address:	604 East LeGrande Avenue, Indianapolis, Indiana 46203
General Source Phone Number:	(317) 782-9628
SIC Code:	3498, 3444
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

(a) One (1) enclosed paint booth, constructed in 2002, used to apply coatings to a limited quantity of small aviation components, identified as EU1, with a maximum capacity to paint approximately 268 aerospace components of various types per month. EU1 uses dry filters, DF1, as control equipment, and exhausts to S1.

(b) Five (5) thermal spray coating booths, applying powder coatings to metal parts, identified as EU2, EU3, and EU4, constructed in 1987, and EU11 and EU12, constructed in 2009, and EU13 approved for construction in 2011 with a maximum coating capacity of 23.8 pounds of metal powder per hour, each, utilizing a Torit Dust Collector, identified as DC1, as particulate control.

EU2 exhausts to DC1 through vent S2.
EU3 and EU12 exhaust to DC1 through vent S3.
EU4 and EU11 exhaust to DC1 through vent S6
EU13 exhausts to DC1 through vent S7.

Under 40 CFR 63, Subpart HHHHHH, these are affected units.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

(a) One (1) toluene pretreatment cleaning operation, constructed in 1987, using a toluene based precleaner called Turco pretreat on titanium parts in order to prevent scale formation during the thermal spraying operation, identified as EU5, with a maximum capacity to use approximately 110 gallons of Turco pretreat per year. EU5 uses no control equipment, and exhausts to S4.

(b) One (1) Titanium etching process, constructed in 1986, which uses Nitric Acid, identified as EU7, using approximately 1,155 gallons of 68%-72% Nitric Acid per year, with no control equipment, and exhausting to S4.

(c) Several Laser Cutting Operations, identified together as EU9, constructed in 1988, all laser cutting operations (EU9) are controlled by Baghouse, BH5, and exhaust to S5.

(d) Forty-one (41) gas fired combustion units, identified as EU10, with the Trane units constructed in 2009 and all other units constructed in 2001, with a combined capacity of 11.03 MMBtu/hr, using no controls and venting inside the building. The following table describes the units in more detail:

Equipment ID	**MMBTU/hr rating**
Radiant Heaters, Combustion Research Corp, M/N 0600NG (24 @ 0.24 MMBtu/hr each)	5.76
Radiant Heater, Combustion Research Corp, M/N 0800NG	0.13
Radiant Heaters, Combustion Research Corp, M/N 0845NG (2 @ 0.20 MMBtu/hr each)	0.40
Radiant Heater, Combustion Reasearch Corp, M/N 0900NG	0.11
HVAC, Trane, M/N YCH300B4HOGA	0.40
HVAC, Trane, M/N YCH108B4HOFA	0.40
HVAC, Trane, M/N TXC064C5HPC0 (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Trane, M/N 2TXC0061AC3HCAA	0.40
HVAC, Carrier, M/N 2TXCC060BC3HCAA (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Carrier, M/N 48TJE016	0.40
HVAC, Bryant, M/N 580DPV090180ABAA	0.40
HV, Reznor, M/N EEXL225	0.23
HV, Reznor, M/N XL200	0.20
HV, Reznor, M/N F200	0.20
HV, Dayton, M/N 3E230B	0.40
Total (41units)	**11.03**

(e) Various welding operations, including four (4) semi-automatic TIG welders, eleven (11) TIG line welder, four (4) TIG welding stations, and three (3) MIG welding stations. Maximum electrode usage is 1 pound per hour each for MIG and TIG operations. All welding operations are controlled with various dust collectors.

(f) An acid cleaning department consisting of various steam cleaning and acid immersion tanks. This includes a sodium hydroxide tank, a nitric acid tank, a sodium chromate tank, and a chromic acid/phosphoric acid tank. All acid cleaning activities with the exception of the nitric acid tank for the titanium etching activity (accounted for in emission calculations) result in no VOC or HAP emissions, and are not included in the emission calculations.

(g) Various fabrication processes, consisting of forming, sizing, pressing, machining, grinding, cutting and drilling. Various pieces of equipment are located thoughout the facility to accomplish these tasks. Some of this equipment includes argon fired heat

treating furnaces, thermal presses, electric ovens, mills, lathes, drills, grinders, sanders, buffing wheels, and deburring brushes. None of this equipment is expected to generate significant amounts of criteria or HAP pollutants, in addition, many of these emission sources are considered exempt pursuant to 326 IAC 2-1.1-3.

(h) Metal conditioning emissions, including plating, anodizing, and hardening. The plating process consists of a sodium hydroxide tank, a sulfuric acid tank, a nickel strike tank, and a nickel sulfamate tank. None of the materials used in the plating process consist of VOC or HAP emissions.

(i) Non destructive testing of parts for cracks and other defects.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

Terms in this permit 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 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F097-30090-00011, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability REF!

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

(1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 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, Indiana 46204-2251

(b) The annual compliance certification report required by this permit 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.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee 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 Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. (The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).)

(c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly

signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of permits established prior to F097-30090-00011 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 permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) 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.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.19 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee 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).

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-8-4(3)]

C.8 Performance Testing [326 IAC 3-6]

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.11 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

no later than ninety (90) days after the date of issuance of this permit.

The ERP does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall record the reasonable response steps taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit 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.

(d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) enclosed paint booth, constructed in 2002, used to apply coatings to a limited quantity of small aviation components, identified as EU1, with a maximum capacity to paint approximately 268 aerospace components of various types per month. EU1 uses dry filters, DF1, as control equipment, and exhausts to S1.

(b) Five (5) thermal spray coating booths, applying powder coatings to metal parts, identified as EU2, EU3, and EU4, constructed in 1987, and EU11 and EU12, constructed in 2009, and EU13 approved for construction in 2011 with a maximum coating capacity of 23.8 pounds of metal powder per hour, each, utilizing a Torit Dust Collector, identified as DC1, as particulate control. These are currently permitted as dry filters, however; it is actually a dust collector.

EU2 exhausts to DC1 through vent S2.
EU3 and EU12 exhaust to DC1 through vent S3.
EU4 and EU11 exhaust to DC1 through vent S6
EU13 exhausts to DC1 through vent S7.

Under 40 CFR 63, Subpart HHHHHH, these are affected units.

(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 2-8-4(1)]

D.1.1 Hazardous Air Pollutants (HAP) Limitations [326 IAC 2-4.1] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, and in order to render the requirements of 326 IAC 2-4.1 (MACT) not applicable, the hazardous air pollutants emissions from the Torit Dust Collection (DC-1) shall be limited as follows:

(a) The total input of any single HAP shall not exceed the following:

HAP	Emission Limit (lb/hr)
Cobalt	2.05
Chromium	2.05
Nickel	2.05

(b) The total emissions of any combination of HAPs shall not exceed 5.25 pounds per hour.

Compliance with these limits, combined with the potential to emit of HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of any single HAP to less than ten (10) tons per 12 consecutive month period and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-4.1 (MACT) and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 FESOP Limitations [326 IAC 2-8-4] [326 IAC 2-1.1-5]

(a) Pursuant to 326 IAC 2-8-4 (FESOP), PM10 emissions from Torit Dust Collector (DC1) shall not exceed 20.30 pounds per hour.

(b) Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable, PM2.5 emissions for Torit Dust Collector (DC1) shall not exceed 20.30 pounds per hour.

Compliance with these limitations, combined with the potential to emit PM10 and PM2.5 from other emission units at this source, shall limit the source-wide PTE of PM10 and PM2.5 to less than 100 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 (Part 70) and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable.

D.1.3 Particulate Matter (PM) PSD Minor Limits [326 IAC 2-2]

In order to render the 326 IAC 2-2 (PSD) requirements not applicable, particulate matter (PM) emissions from Torit Dust Collector (DC1) shall not exceed 54.79 pounds per hour.

Compliance with this limitation, combined with the potential to emit PM from other emission units at this source, shall limit the source-wide PTE of PM to less than 250 tons per twelve (12) consecutive month period and shall render the requirement of 326 IAC 2-2 not applicable.

D.1.4 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, particulate emissions from the enclosed paint booth ((EU1) and the six (6) thermal spray coating booths (EU2, EU3, EU4, EU 11, EU12, and EU13), shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for the enclosed paint booth ((EU1), the six (6) thermal spray coating booths (EU2, EU3, EU4, EU 11, EU12, and EU13) and their control devices, identified as DF1 and DC2. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.6 Particulate Control

(a) In order to comply with Conditions D.1.1, D.1.2, D.1.3, and D.1.4 the Torit Dust Collector, identified as DC1, shall be in operation and control emissions at all times the thermal spray coating booths (EU2, EU3, EU4, EU 11, EU12, and EU13) are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) day or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the result of any response actions take up to the time of notification.

Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]

D.1.7 Visible Emissions Notations

(a) Visible emission notations of the Torit Dust Collector, identified as DC1, exhaust shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C- Response to Excursions or Exceedances contains the Permittee's obligation

D.1.8 Parametric Monitoring

The Permittee shall record the pressure drop across Torit Dust Collector, identified as DC1, used in conjunction with thermal spray coating booths (EU2, EU3, EU4, EU 11, EU12, and EU13), at least once per day when any thermal spray coating booth is in operation. When for any one reading, the pressure drop across the Torit Dust Collector is outside the normal range of 1.0 to 6.0 inches of water or a range established during the last stack test, the Permittee shall take reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take reasonable steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least every six (6) months.

D.1.9 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.1.10 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.7, the Permittee shall maintain daily records of the visible emission notations of the Torit Dust Collector (DC1) stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation, (i.e. the process did not operate that day).

(b) To document the compliance status with Condition D.1.8, the Permittee shall maintain daily records of the pressure drop across the Torit Dust Collector (DC1) controlling the thermal spray coating booths (EU2, EU3, EU4, EU 11, EU12, and EU13). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).

(c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

(a) Several Laser Cutting Operations, identified together as EU9, constructed in 1988, all laser cutting operations (EU9) are controlled by Baghouse, BH5, and exhaust to S5.

(b) Forty-one (41) gas fired combustion units, identified as EU10, with the Trane units constructed in 2009 and all other units constructed in 2001, with a combined capacity of 11.03 MMBtu/hr, using no controls and venting inside the building. The following table describes the units in more detail:

Equipment ID	MMBTU/hr rating
Radiant Heaters, Combustion Research Corp, M/N 0600NG (24 @ 0.24 MMBtu/hr each)	5.76
Radiant Heater, Combustion Research Corp, M/N 0800NG	0.13
Radiant Heaters, Combustion Research Corp, M/N 0845NG (2 @ 0.20 MMBtu/hr each)	0.40
Radiant Heater, Combustion Reasearch Corp, M/N 0900NG	0.11
HVAC, Trane, M/N YCH300B4HOGA	0.40
HVAC, Trane, M/N YCH108B4HOFA	0.40
HVAC, Trane, M/N TXC064C5HPC0 (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Trane, M/N 2TXC0061AC3HCAA	0.40
HVAC, Carrier, M/N 2TXCC060BC3HCAA (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Carrier, M/N 48TJE016	0.40
HVAC, Bryant, M/N 580DPV090180ABAA	0.40
HV, Reznor, M/N EEXL225	0.23
HV, Reznor, M/N XL200	0.20
HV, Reznor, M/N F200	0.20
HV, Dayton, M/N 3E230B	0.40
Total (41units)	**11.03**

(c) Various welding operations, including four (4) semi-automatic TIG welders, eleven (11) TIG line welder, four (4) TIG welding stations, and three (3) MIG welding stations. Maximum electrode usage is 1 pound per hour each for MIG and TIG operations. All welding operations are controlled with various dust collectors.

(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 2-6.1-5(a)(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2, particulate emissions from the forty-one (41) gas fired combustion units (EU10) and the welding operations shall not allow or permit discharge to the atmosphere of any gases which contain particulate matter in excess of 0.03 grain per dry standard cubic foot (dscf).

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) Five (5) thermal spray coating booths, applying powder coatings to metal parts, identified as EU2, EU3, and EU4, constructed in 1987, and EU11 and EU12, constructed in 2009, with a combined maximum coating capacity of 23.8 pounds per hour, utilizing a Torit Dust Collector, identified as DC1, as particulate control. EU2 exhausts to DC1 through vent S2. EU3 and EU12 exhaust to DC1 through vent S3. EU4 and EU11 exhaust to DC1 through vent S6.

Under 40 CFR 63, Subpart HHHHHH, these are affected units.

(c) One (1) thermal spray coating booth, applying powder coatings to metal parts, identified as EU13, approved for construction in 2011, with a maximum coating application capacity of 23.8 pounds per hour, exhausting to Torit Dust Collector DC1 through vent S7.

Under 40 CFR 63, Subpart HHHHHH, this is an affected unit

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

E.1.1 General Provisions Relating to NESHAP HHHHHH [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart HHHHHH.

E.1.2 Paint Stripping and Miscellaneous Surface Coating at Area Sources NESHAP [40 CFR 63, Subpart HHHHHH] [326 IAC 20-14]

The Permittee shall comply with the following provisions of 40 CFR 63, Subpart HHHHHH as specified in Attachment A of this permit:

(1) 40 CFR 63.11169 (c)
(2) 40 CFR 63.11170 (a)(3)
(3) 40 CFR 63.11170 (b)
(4) 40 CFR 63.11171 (a)-(b)(5)
(5) 40 CFR 63.11171 (e)
(6) 40 CFR 63.11172 (b)
(7) 40 CFR 63.11173 (f)
(8) 40 CFR 63.11174
(9) 40 CFR 63.11175 (a)(1)-(5)(i), (7), (8)(b)(1)-(3)
(10) 40 CFR 63.11176 (a)
(11) 40 CFR 63.11177 (a)
(12) 40 CFR 63.11177 (c)-(d)
(13) 40 CFR 63.11177 (g)-(h)
(14) 40 CFR 63.11178
(15) 40 CFR 63.11179
(16) 40 CFR 63.11180

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Aerofab, Division of Tube Processing Corporation
Source Address: 604 East LeGrande Avenue, Indianapolis, Indiana 46203
FESOP Permit No.: F097-30090-00011

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify)_____

☐ Report (specify)_____

☐ Notification (specify)_____

☐ Affidavit (specify)_____

☐ Other (specify)_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Signature:
Printed Name:
Title/Position:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) EMERGENCY OCCURRENCE REPORT

Source Name: Aerofab, Division of Tube Processing Corporation
Source Address: 604 East LeGrande Avenue, Indianapolis, Indiana 46203
FESOP Permit No.: F097-30090-00011

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Aerofab, Division of Tube Processing Corporation
Source Address: 604 East LeGrande Avenue, Indianapolis, Indiana 46203
FESOP Permit No.: F097-30090-00011

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ANo deviations occurred this reporting period@.	
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

Attachment A

National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, Subpart HHHHHH

Aerofab, Division of Tube Processing Corporation

Title 40: Protection of Environment

PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES (CONTINUED)

Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

Source: 73 FR 1759, Jan. 9, 2008, unless otherwise noted.

What This Subpart Covers

§ 63.11169 What is the purpose of this subpart?

Except as provided in paragraph (d) of this section, this subpart establishes national emission standards for hazardous air pollutants (HAP) for area sources involved in any of the activities in paragraphs (a) through (c) of this section. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission standards contained herein.

(a) Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service number 75092, in paint removal processes;

(b) Autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations;

(c) Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

(d) This subpart does not apply to any of the activities described in paragraph (d)(1) through (6) of this section.

(1) Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.

(2) Surface coating or paint stripping of military munitions, as defined in §**63**.11180, manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or equipment directly and exclusively used for the purposes of transporting military munitions.

(3) Surface coating or paint stripping performed by individuals on their personal vehicles, possessions, or property, either as a hobby or for maintenance of their personal vehicles, possessions, or property. This subpart also does not apply when these operations are performed by individuals for others without compensation. An individual who spray applies surface coating to more than two motor vehicles or pieces of mobile equipment per year is subject to the requirements in this subpart that pertain to motor vehicle and mobile equipment surface coating regardless of whether compensation is received.

(4) Surface coating or paint stripping that meets the definition of “research and laboratory activities” in §**63**.11180.

(5) Surface coating or paint stripping that meets the definition of “quality control activities” in §**63**.11180.

(6) Surface coating or paint stripping activities that are covered under another area source NESHAP.

§ 63.11170 Am I subject to this subpart?

(a) You are subject to this subpart if you operate an area source of HAP as defined in paragraph (b) of this section, including sources that are part of a tribal, local, State, or Federal facility and you perform one or more of the activities in paragraphs (a)(1) through (3) of this section:

(1) Perform paint stripping using MeCl for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates.

(2) Perform spray application of coatings, as defined in §**63**.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations, and mobile repair and refinishing operations that travel to the customer's location, except spray coating applications that meet the definition of facility maintenance in §**63**.11180. However, if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition the Administrator for an exemption from this subpart if you can demonstrate, to the satisfaction of the Administrator, that you spray apply no coatings that contain the target HAP, as defined in §**63**.11180.

Petitions must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP. If circumstances change such that you intend to spray apply coatings containing the target HAP, you must submit the initial notification required by **63**.11175 and comply with the requirements of this subpart.

(3) Perform spray application of coatings that contain the target HAP, as defined in §**63**.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in §**63**.11180.

(b) An area source of HAP is a source of HAP that is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year, or emit any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year.

§ 63.11171 How do I know if my source is considered a new source or an existing source?

(a) This subpart applies to each new and existing affected area source engaged in the activities listed in §**63**.11170, with the exception of those activities listed in §**63**.11169(d) of this subpart.

(b) The affected source is the collection of all of the items listed in paragraphs (b)(1) through (6) of this section. Not all affected sources will have all of the items listed in paragraphs (b)(1) through (6) of this section.

(1) Mixing rooms and equipment;

(2) Spray booths, ventilated prep stations, curing ovens, and associated equipment;

(3) Spray guns and associated equipment;

(4) Spray gun cleaning equipment;

(5) Equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint; and

(6) Equipment used for paint stripping at paint stripping facilities using paint strippers containing MeCl.

(c) An affected source is a new source if it meets the criteria in paragraphs (c)(1) and (c)(2) of this section.

(1) You commenced the construction of the source after September 17, 2007 by installing new paint stripping or surface coating equipment. If you purchase and install spray booths, enclosed spray gun cleaners, paint stripping equipment to reduce MeCl emissions, or purchase new spray guns to comply with this subpart at an existing source, these actions would not make your existing source a new source.

(2) The new paint stripping or surface coating equipment is used at a source that was not actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007.

(d) An affected source is reconstructed if it meets the definition of reconstruction in §**63**.2.

(e) An affected source is an existing source if it is not a new source or a reconstructed source.

General Compliance Requirements

§ 63.11172 When do I have to comply with this subpart?

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) and (b) of this section.

(a) For a new or reconstructed affected source, the compliance date is the applicable date in paragraph (a)(1) or (2) of this section:

(1) If the initial startup of your new or reconstructed affected source is after September 17, 2007, the compliance date is January 9, 2008.

(2) If the initial startup of your new or reconstructed affected source occurs after January 9, 2008, the compliance date is the date of initial startup of your affected source.

(b) For an existing affected source, the compliance date is January 10, 2011.

§ 63.11173 What are my general requirements for complying with this subpart?

(a) Each paint stripping operation that is an affected area source must implement management practices to minimize the evaporative emissions of MeCl. The management practices must address, at a minimum, the practices in paragraphs (a)(1) through (5) of this section, as applicable, for your operations.

(1) Evaluate each application to ensure there is a need for paint stripping (e.g., evaluate whether it is possible to re-coat the piece without removing the existing coating).

(2) Evaluate each application where a paint stripper containing MeCl is used to ensure that there is no alternative paint stripping technology that can be used.

(3) Reduce exposure of all paint strippers containing MeCl to the air.

(4) Optimize application conditions when using paint strippers containing MeCl to reduce MeCl evaporation (e.g., if the stripper must be heated, make sure that the temperature is kept as low as possible to reduce evaporation).

(5) Practice proper storage and disposal of paint strippers containing MeCl (e.g., store stripper in closed, air-tight containers).

(b) Each paint stripping operation that has annual usage of more than one ton of MeCl must develop and implement a written MeCl minimization plan to minimize the use and emissions of MeCl. The MeCl minimization plan must address, at a minimum, the management practices specified in paragraphs (a)(1) through (5) of this section, as applicable, for your operations. Each operation must post a placard or sign outlining the MeCl minimization plan in each area where paint stripping operations subject to this subpart occur. Paint stripping operations with annual usage of less than one ton of MeCl, must comply with the requirements in paragraphs (a)(1) through (5) of this section, as applicable, but are not required to develop and implement a written MeCl minimization plan.

(c) Each paint stripping operation must maintain copies of annual usage of paint strippers containing MeCl on site at all times.

(d) Each paint stripping operation with annual usage of more than one ton of MeCl must maintain a copy of their current MeCl minimization plan on site at all times.

(e) Each motor vehicle and mobile equipment surface coating operation and each miscellaneous surface coating operation must meet the requirements in paragraphs (e)(1) through (e)(5) of this section.

(1) All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (f) of this section. The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in paragraph (f) of this section. The requirements of this paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this paragraph.

(2) All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of paragraph (e)(2)(i) of this section and either paragraph (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv) of this section.

(i) All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, “Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992” (incorporated by reference, see §**63**.14 of subpart A of this part). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement. The requirements of this paragraph do not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications.

(ii) Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.

(iii) Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.

(iv) Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.

(3) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's “Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989” and “Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002” (incorporated by reference, see §**63**.14 of subpart A of this part). The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).

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

(5) As provided in §**63**.6(g), we, the U.S. Environmental Protection Agency, may choose to grant you permission to use an alternative to the emission standards in this section after you have requested approval to do so according to §**63**.6(g)(2).

(f) Each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §**63**.11180, are trained in the proper application of surface coatings as required by paragraph (e)(1) of this section. The training program must include, at a minimum, the items listed in paragraphs (f)(1) through (f)(3) of this section.

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

(2) Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (f)(2)(i) through (2)(iv) of this section.

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

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

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

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

(3) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (f)(2) of this section are not required to provide the initial training required by that paragraph to these painters.

(g) As required by paragraph (e)(1) of this section, all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in §**63**.11180, must be trained by the dates specified in paragraphs (g)(1) and (2) of this section. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

(1) If your source is a new source, all personnel must be trained and certified no later than 180 days after hiring or no later than July 7, 2008, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

(2) If your source is an existing source, all personnel must be trained and certified no later than 180 days after hiring or no later than January 10, 2011, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in paragraph (f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.

(3) Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.

[73 FR 1760, Jan. 9, 2008; 73 FR 8408, Feb. 13, 2008]

§ 63.11174 What parts of the General Provisions apply to me?

(a) Table 1 of this subpart shows which parts of the General Provisions in subpart A apply to you.

(b) If you are an owner or operator of an area source subject to this subpart, you are exempt from the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.

Notifications, Reports, and Records

§ 63.11175 What notifications must I submit?

(a) Initial Notification. If you are the owner or operator of a paint stripping operation using paint strippers containing MeCl and/or a surface coating operation subject to this subpart, you must submit the initial notification required by §**63**.9(b). For a new affected source, you must submit the Initial Notification no later than 180 days after initial startup or July 7, 2008, whichever is later. For an existing affected source, you must submit the initial notification no later than January 11, 2010. The initial notification must provide the information specified in paragraphs (a)(1) through (8) of this section.

(1) The company name, if applicable.

(2) The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;

(3) The street address (physical location) of the affected source and the street address where compliance records are maintained, if different. If the source is a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location, such as a collision repair shop, the notification should state this and indicate the physical location where records are kept to demonstrate compliance;

(4) An identification of the relevant standard (i.e., this subpart, 40 CFR part **63**, subpart **HHHHHH**);

(5) A brief description of the type of operation as specified in paragraph (a)(5)(i) or (ii) of this section.

(i) For all surface coating operations, indicate whether the source is a motor vehicle and mobile equipment surface coating operation or a miscellaneous surface coating operation, and include the number of spray booths and preparation stations, and the number of painters usually employed at the operation.

(ii) For paint stripping operations, identify the method(s) of paint stripping employed (e.g., chemical, mechanical) and the substrates stripped (e.g., wood, plastic, metal).

(6) Each paint stripping operation must indicate whether they plan to annually use more than one ton of MeCl after the compliance date.

(7) A statement of whether the source is already in compliance with each of the relevant requirements of this subpart, or whether the source will be brought into compliance by the compliance date. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in §**63**.11173(a) through (d) of this subpart. For surface coating operations, the relevant requirements are specified in §**63**.11173(e) through (g) of this subpart.

(8) If your source is a new source, you must certify in the initial notification whether the source is in compliance with each of the requirements of this subpart. If your source is an existing source, you may certify in the initial notification that the source is already in compliance. If you are certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.

(b) Notification of Compliance Status. If you are the owner or operator of a new source, you are not required to submit a separate notification of compliance status in addition to the initial notification specified in paragraph (a) of this subpart provided you were able to certify compliance on the date of the initial notification, as part of the initial notification, and your compliance status has not since changed. If you

are the owner or operator of any existing source and did not certify in the initial notification that your source is already in compliance as specified in paragraph (a) of this section, then you must submit a notification of compliance status. You must submit a Notification of Compliance Status on or before March 11, 2011. You are required to submit the information specified in paragraphs (b)(1) through (4) of this section with your Notification of Compliance Status:

(1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

(2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. For paint stripping operations, the relevant requirements that you must evaluate in making this determination are specified in §**63**.11173(a) through (d). For surface coating operations, the relevant requirements are specified in §**63**.11173(e) through (g).

(3) The date of the Notification of Compliance Status.

(4) If you are the owner or operator of an existing affected paint stripping source that annually uses more than one ton of MeCl, you must submit a statement certifying that you have developed and are implementing a written MeCl minimization plan in accordance with §**63**.11173(b).

§ 63.11176 What reports must I submit?

(a) Annual Notification of Changes Report. If you are the owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous surface coating affected source, you are required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §**63**.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in §**63**.11173(a) through (d) or §**63**.11173(e) through (g) on the date of the report will be deemed to be a change. This includes notification when paint stripping affected sources that have not developed and implemented a written MeCl minimization plan in accordance with §**63**.11173(b) used more than one ton of MeCl in the previous calendar year. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (a)(1) through (2) of this section.

(1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

(2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.

(b) If you are the owner or operator of a paint stripping affected source that has not developed and implemented a written MeCl minimization plan in accordance with §**63**.11173(b) of this subpart, you must submit a report for any calendar year in which you use more than one ton of MeCl. This report must be submitted no later than March 1 of the following calendar year. You must also develop and implement a written MeCl minimization plan in accordance with §**63**.11173(b) no later than December 31. You must then submit a Notification of Compliance Status report containing the information specified in §**63**.11175(b) by March 1 of the following year and comply with the requirements for paint stripping operations that annually use more than one ton of MeCl in §§**63**.11173(d) and **63**.11177(f).

§ 63.11177 What records must I keep?

If you are the owner or operator of a surface coating operation, you must keep the records specified in paragraphs (a) through (d) and (g) of this section. If you are the owner or operator of a paint stripping operation, you must keep the records specified in paragraphs (e) through (g) of this section, as applicable.

(a) Certification that each painter has completed the training specified in §**63**.11173(f) with the date the initial training and the most recent refresher training was completed.

(b) Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in §**63**.11173(e)(3)(i).

(c) Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in §**63**.11173(e)(4).

(d) Copies of any notification submitted as required by §**63**.11175 and copies of any report submitted as required by §**63**.11176.

(e) Records of paint strippers containing MeCl used for paint stripping operations, including the MeCl content of the paint stripper used. Documentation needs to be sufficient to verify annual usage of paint strippers containing MeCl (e.g., material safety data sheets or other documentation provided by the manufacturer or supplier of the paint stripper, purchase receipts, records of paint stripper usage, engineering calculations).

(f) If you are a paint stripping source that annually uses more than one ton of MeCl you are required to maintain a record of your current MeCl minimization plan on site for the duration of your paint stripping operations. You must also keep records of your annual review of, and updates to, your MeCl minimization plan.

(g) Records of any deviation from the requirements in §§**63**.11173, **63**.11174, **63**.11175, or **63**.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.

(h) Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

§ 63.11178 In what form and for how long must I keep my records?

(a) If you are the owner or operator of an affected source, you must maintain copies of the records specified in §**63**.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

Other Requirements and Information

§ 63.11179 Who implements and enforces this subpart?

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

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

(c) The authority in §**63**.11173(e)(5) will not be delegated to State, local, or tribal agencies.

§ 63.11180 What definitions do I need to know?

Terms used in this subpart are defined in the Clean Air Act, in 40 CFR **63**.2, and in this section as follows:

Additive means a material that is added to a coating after purchase from a supplier (e.g., catalysts, activators, accelerators).

Administrator means, for the purposes of this rulemaking, the Administrator of the U.S. Environmental Protection Agency or the State or local agency that is granted delegation for implementation of this subpart.

Aerospace vehicle or component means any fabricated part, processed part, assembly of parts, or completed unit, with the exception of electronic components, of any aircraft including but not limited to airplanes, helicopters, missiles, rockets, and space vehicles.

Airless and air-assisted airless spray mean any paint spray technology that relies solely on the fluid pressure of the paint to create an atomized paint spray pattern and does not apply any atomizing compressed air to the paint before it leaves the paint nozzle. Air-assisted airless spray uses compressed air to shape and distribute the fan of atomized paint, but still uses fluid pressure to create the atomized paint.

Appurtenance means any accessory to a stationary structure coated at the site of installation, whether installed or detached, including but not limited to: bathroom and kitchen fixtures; cabinets; concrete forms; doors; elevators; fences; hand railings; heating equipment, air conditioning equipment, and other fixed mechanical equipment or stationary tools; lamp posts; partitions; pipes and piping systems; rain gutters and downspouts; stairways, fixed ladders, catwalks, and fire escapes; and window screens.

Architectural coating means a coating to be applied to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs.

Cleaning material means a solvent used to remove contaminants and other materials, such as dirt, grease, or oil, from a substrate before or after coating application or from equipment associated with a coating operation, such as spray booths, spray guns, racks, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both.

Coating means, for the purposes of this subpart, a material spray-applied to a substrate for decorative, protective, or functional purposes. For the purposes of this subpart, coating does not include the following materials:

(1) Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances.

(2) Paper film or plastic film that may be pre-coated with an adhesive by the film manufacturer.

(3) Adhesives, sealants, maskants, or caulking materials.

(4) Temporary protective coatings, lubricants, or surface preparation materials.

(5) In-mold coatings that are spray-applied in the manufacture of reinforced plastic composite parts.

Compliance date means the date by which you must comply with this subpart.

Deviation means any instance in which an affected source, subject to this subpart, or an owner or operator of such a source fails to meet any requirement or obligation established by this subpart.

Dry media blasting means abrasive blasting using dry media. Dry media blasting relies on impact and abrasion to remove paint from a substrate. Typically, a compressed air stream is used to propel the media against the coated surface.

Electrostatic application means any method of coating application where an electrostatic attraction is created between the part to be coated and the atomized paint particles.

Equipment cleaning means the use of an organic solvent to remove coating residue from the surfaces of paint spray guns and other painting related equipment, including, but not limited to stir sticks, paint cups, brushes, and spray booths.

Facility maintenance means, for the purposes of this subpart, surface coating performed as part of the routine repair or renovation of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity. *Facility maintenance* also includes surface coating associated with the installation of new equipment or structures, and the application of any surface coating as part of janitorial activities. *Facility maintenance* includes the application of coatings to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. *Facility maintenance* also includes the refinishing of mobile equipment in the field or at the site where they are used in service and at which they are intended to remain indefinitely after refinishing. Such mobile equipment includes, but is not limited to, farm equipment and mining equipment for which it is not practical or feasible to move to a dedicated mobile equipment refinishing facility. Such mobile equipment also includes items, such as fork trucks, that are used in a manufacturing facility and which are refinished in that same facility. *Facility maintenance* does not include surface coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters.

High-volume, low-pressure (HVLP) spray equipment means spray equipment that is permanently labeled as such and used to apply any coating by means of a spray gun which is designed and operated between 0.1 and 10 pounds per square inch gauge (psig) air atomizing pressure measured dynamically at the center of the air cap and at the air horns.

Initial startup means the first time equipment is brought online in a paint stripping or surface coating operation, and paint stripping or surface coating is first performed.

Materials that contain HAP or *HAP-containing materials* mean, for the purposes of this subpart, materials that contain 0.1 percent or more by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or 1.0 percent or more by mass for any other individual HAP.

Military munitions means all ammunition products and components produced or used by or for the U.S. Department of Defense (DoD) or for the U.S. Armed Services for national defense and security, including military munitions under the control of the Department of Defense, the U.S. Coast Guard, the National Nuclear Security Administration (NNSA), U.S. Department of Energy (DOE), and National Guard personnel. The term military munitions includes: confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DoD components, including bulk explosives and chemical warfare agents, chemical munitions, biological weapons, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, nonnuclear components of nuclear weapons, wholly inert ammunition products, and all devices and components of any items listed in this definition.

Miscellaneous parts and/or products means any part or product made of metal or plastic, or combinations of metal and plastic. Miscellaneous parts and/or products include, but are not limited to, metal and plastic components of the following types of products as well as the products themselves: motor vehicle parts and accessories for automobiles, trucks, recreational vehicles; automobiles and light duty trucks at automobile and light duty truck assembly plants; boats; sporting and recreational goods; toys; business machines; laboratory and medical equipment; and household and other consumer products.

Miscellaneous surface coating operation means the collection of equipment used to apply surface coating to miscellaneous parts and/or products made of metal or plastic, including applying cleaning solvents to prepare the surface before coating application, mixing coatings before application, applying coating to a surface, drying or curing the coating after application, and cleaning coating application equipment, but not plating. A single surface coating operation may include any combination of these types of equipment, but always includes at least the point at which a coating material is applied to a given part. A surface coating operation includes all other steps (such as surface preparation with solvent and equipment cleaning) in the affected source where HAP are emitted from the coating of a part. The use of solvent to clean parts (for example, to remove grease during a mechanical repair) does not constitute a miscellaneous surface coating operation if no coatings are applied. A single affected source may have multiple surface coating operations. Surface coatings applied to wood, leather, rubber, ceramics, stone, masonry, or substrates other than metal and plastic are not considered miscellaneous surface coating operations for the purposes of this subpart.

Mobile equipment means any device that may be drawn and/or driven on a roadway including, but not limited to, heavy-duty trucks, truck trailers, fleet delivery trucks, buses, mobile cranes, bulldozers, street cleaners, agriculture equipment, motor homes, and other recreational vehicles (including camping trailers and fifth wheels).

Motor vehicle means any self-propelled vehicle, including, but not limited to, automobiles, light duty trucks, golf carts, vans, and motorcycles.

Motor vehicle and mobile equipment surface coating means the spray application of coatings to assembled motor vehicles or mobile equipment. For the purposes of this subpart, it does not include the surface coating of motor vehicle or mobile equipment parts or subassemblies at a vehicle assembly plant or parts manufacturing plant.

Non-HAP solvent means, for the purposes of this subpart, a solvent (including thinners and cleaning solvents) that contains less than 0.1 percent by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and less than 1.0 percent by mass for any other individual HAP.

Paint stripping and/or miscellaneous surface coating source or facility means any shop, business, location, or parcel of land where paint stripping or miscellaneous surface coating operations are conducted.

Paint stripping means the removal of dried coatings from wood, metal, plastic, and other substrates. A single affected source may have multiple paint stripping operations.

Painter means any person who spray applies coating.

Plastic refers to substrates containing one or more resins and may be solid, porous, flexible, or rigid. Plastics include fiber reinforced plastic composites.

Protective oil means organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes, but is not limited to, lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils.

Quality control activities means surface coating or paint stripping activities that meet all of the following criteria:

(1) The activities associated with a surface coating or paint stripping operation are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.

(2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are surface coated or stripped are not sold and do not leave the facility.

(3) The activities are not a normal part of the surface coating or paint stripping operation; for example, they do not include color matching activities performed during a motor vehicle collision repair.

(4) The activities do not involve surface coating or stripping of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

Research and laboratory activities means surface coating or paint stripping activities that meet one of the following criteria:

(1) Conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, or environmental impact.

(2) Activities conducted to test more efficient production processes, including alternative paint stripping or surface coating materials or application methods, or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit.

(3) Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit.

Solvent means a fluid containing organic compounds used to perform paint stripping, surface prep, or cleaning of surface coating equipment.

Space Vehicle means vehicles designed to travel beyond the limit of the earth's atmosphere, including but not limited to satellites, space stations, and the Space Shuttle System (including orbiter, external tanks, and solid rocket boosters).

Spray-applied coating operations means coatings that are applied using a hand-held device that creates an atomized mist of coating and deposits the coating on a substrate. For the purposes of this subpart, spray-applied coatings do not include the following materials or activities:

(1) Coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces (89 cubic centimeters).

(2) Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.

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

Surface preparation or *Surface prep* means use of a cleaning material on a portion of or all of a substrate prior to the application of a coating.

Target HAP are compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

Target HAP containing coating means a spray-applied coating that contains any individual target HAP that is an Occupational Safety and Health Administration (OSHA)–defined carcinogen as specified in 29 CFR 1910.1200(d)(4) at a concentration greater than 0.1 percent by mass, or greater than 1.0 percent by mass for any other individual target HAP compound. For the purpose of determining whether materials you use contain the target HAP compounds, you may rely on formulation data provided by the manufacturer or supplier, such as the material safety data sheet (MSDS), as long as it represents each target HAP compound in the material that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other target HAP compounds.

Transfer efficiency means the amount of coating solids adhering to the object being coated divided by the total amount of coating solids sprayed, expressed as a percentage. Coating solids means the nonvolatile portion of the coating that makes up the dry film.

Truck bed liner coating means any coating, excluding color coats, labeled and formulated for application to a truck bed to protect it from surface abrasion.

Table 1 to Subpart HHHHHH of Part 63—Applicability of General Provisions to Subpart HHHHHH of Part 63

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§**63**.1(a)(1)–(12)	General Applicability	Yes	
§**63**.1(b)(1)–(3)	Initial Applicability Determination	Yes	Applicability of subpart **HHHHHH** is also specified in §**63**.11170.
§**63**.1(c)(1)	Applicability After Standard Established	Yes	

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§**63**.1(c)(2)	Applicability of Permit Program for Area Sources	Yes	(**63**.11174(b) of Subpart **HHHHHH** exempts area sources from the obligation to obtain Title V operating permits.
§**63**.1(c)(5)	Notifications	Yes	
§**63**.1(e)	Applicability of Permit Program to Major Sources Before Relevant Standard is Set	No	(**63**.11174(b) of Subpart **HHHHHH** exempts area sources from the obligation to obtain Title V operating permits.
§**63**.2	Definitions	Yes	Additional definitions are specified in §**63**.11180.
§**63**.3(a)–(c)	Units and Abbreviations	Yes	
§**63**.4(a)(1)–(5)	Prohibited Activities	Yes	
§**63**.4(b)–(c)	Circumvention/Fragmentation	Yes	
§**63**.5	Construction/Reconstruction of major sources	No	Subpart **HHHHHH** applies only to area sources.
§**63**.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	Yes	
§**63**.6(b)(1)–(7)	Compliance Dates for New and Reconstructed Sources	Yes	§**63**.11172 specifies the compliance dates.
§**63**.6(c)(1)–(5)	Compliance Dates for Existing Sources	Yes	§**63**.11172 specifies the compliance dates.
§**63**.6(e)(1)–(2)	Operation and Maintenance	Yes	
§**63**.6(e)(3)	Startup, Shutdown, and Malfunction Plan	No	No startup, shutdown, and malfunction plan is required by subpart **HHHHHH**.
§**63**.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	Yes	
§**63**.6(f)(2)–(3)	Methods for Determining Compliance	Yes	

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§**63**.6(g)(1)–(3)	Use of an Alternative Standard	Yes	
§**63**.6(h)	Compliance With Opacity/Visible Emission Standards	No	Subpart **HHHHHH** does not establish opacity or visible emission standards.
§**63**.6(i)(1)–(16)	Extension of Compliance	Yes	
§**63**.6(j)	Presidential Compliance Exemption	Yes	
§**63**.7	Performance Testing Requirements	No	No performance testing is required by subpart **HHHHHH**.
§**63**.8	Monitoring Requirements	No	Subpart **HHHHHH** does not require the use of continuous monitoring systems.
§**63**.9(a)–(d)	Notification Requirements	Yes	§**63**.11175 specifies notification requirements.
§**63**.9(e)	Notification of Performance Test	No	Subpart **HHHHHH** does not require performance tests.
§**63**.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart **HHHHHH** does not have opacity or visible emission standards.
§**63**.9(g)	Additional Notifications When Using CMS	No	Subpart **HHHHHH** does not require the use of continuous monitoring systems.
§**63**.9(h)	Notification of Compliance Status	No	§**63**.11175 specifies the dates and required content for submitting the notification of compliance status.
§**63**.9(i)	Adjustment of Submittal Deadlines	Yes	
§**63**.9(j)	Change in Previous Information	Yes	§**63**.11176(a) specifies the dates for submitting the notification of changes report.
§**63**.10(a)	Recordkeeping/Reporting—Applicability and General	Yes	

Citation	Subject	Applicable to subpart HHHHHH	Explanation
	Information		
§**63**.10(b)(1)	General Recordkeeping Requirements	Yes	Additional requirements are specified in §**63**.11177.
§**63**.10(b)(2)(i)–(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS	No	Subpart **HHHHHH** does not require startup, shutdown, and malfunction plans, or CMS.
§**63**.10(b)(2)(xii)	Waiver of recordkeeping requirements	Yes	
§**63**.10(b)(2)(xiii)	Alternatives to the relative accuracy test	No	Subpart **HHHHHH** does not require the use of CEMS.
§**63**.10(b)(2)(xiv)	Records supporting notifications	Yes	
§**63**.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	
§**63**.10(c)	Additional Recordkeeping Requirements for Sources with CMS	No	Subpart **HHHHHH** does not require the use of CMS.
§**63**.10(d)(1)	General Reporting Requirements	Yes	Additional requirements are specified in §**63**.11176.
§**63**.10(d)(2)–(3)	Report of Performance Test Results, and Opacity or Visible Emissions Observations	No	Subpart **HHHHHH** does not require performance tests, or opacity or visible emissions observations.
§**63**.10(d)(4)	Progress Reports for Sources With Compliance Extensions	Yes	
§**63**.10(d)(5)	Startup, Shutdown, and Malfunction Reports	No	Subpart **HHHHHH** does not require startup, shutdown, and malfunction reports.
§**63**.10(e)	Additional Reporting requirements for Sources with CMS	No	Subpart **HHHHHH** does not require the use of CMS.
§**63**.10(f)	Recordkeeping/Reporting Waiver	Yes	
§**63**.11	Control Device Requirements/Flares	No	Subpart **HHHHHH** does not require the use of flares.
§**63**.12	State Authority and Delegations	Yes	

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§**63**.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	Yes	
§**63**.14	Incorporation by Reference	Yes	Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in §**63**.11173(e)(2) and (3) are incorporated and included in §**63**.14.
§**63**.15	Availability of Information/Confidentiality	Yes	
§**63**.16(a)	Performance Track Provisions—reduced reporting	Yes	
§**63**.16(b)–(c)	Performance Track Provisions—reduced reporting	No	Subpart **HHHHHH** does not establish numerical emission limits.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor State Operating Permit (MSOP) Transitioning to a New Source Review and Federally Enforceable State Operating Permit (FESOP)

Source Description and Location

Source Name:	**Aerofab, Division of Tube Processing Corporation**
Source Location:	**604 East LeGrande Avenue, Indianapolis, Indiana 46203**
County:	**Marion (Center Township)**
SIC Code:	**3498, 3444**
Operation Permit No.:	**F 097-30090-00011**
Permit Reviewer:	**Bruce Farrar**

On January 6, 2011, the Office of Air Quality (OAQ) received an application from Aerofab, Division of Tube Processing Corporation related to the construction and operation of new emission units at an existing plant and transition from a MSOP to a FESOP. The operation of the new thermal spray coating booth, EU13, increases the PTE for PM10 and PM2.5 to over 100 tons per year.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) MSOP, Notice Only Change No. 097-28968-00011, issued on March 12, 2010.

(b) MSOP New Construction No. 097-23488-00011, issued on June 24, 2009.

Due to this application, the source is transitioning from a MSOP to a FESOP.

County Attainment Status

The source is located in Marion County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of Indianapolis bounded by 11th Street on the north; Capitol Avenue on the west; Georgia Street on the south; and Delaware Street on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of Indianapolis and Marion County.
O_3	Attainment effective November 8, 2007, 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	Attainment effective July 10, 2000, for the part of Franklin Township bounded by Thompson Road on the south; Emerson Avenue on the west; Five Points Road on the east; and Troy Avenue on the north. Attainment effective July 10, 2000, for the part of Wayne Township bounded by Rockville Road on the north; Girls School Road on the east; Washington Street on the south; and Bridgeport Road on the west. The remainder of the county is not designated.

[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the Indianapolis area, including Marion County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005. Basic nonattainment designation effective federally 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. Marion 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) $PM_{2.5}$
Marion County has been classified as nonattainment for $PM_{2.5}$ in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for $PM_{2.5}$ emissions. These rules became effective on July 15, 2008. Therefore, direct $PM_{2.5}$ and SO_2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants
Marion 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

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Background and Description of Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Aerofab, Division of Tube Processing Corporation on January 6, 2011, relating to construction of a new thermal spray coating booth. The operation of this new thermal spray coating booth will increase the PTE for PM10 and PM2.5 to over 100 tons per year, therefore a FESOP will be issued.

The source consists of the following permitted emission units:

(a) One (1) enclosed paint booth, constructed in 2002, used to apply coatings to a limited quantity of small aviation components, identified as EU1, with a maximum capacity to paint approximately 268 aerospace components of various types per month. EU1 uses dry filters, DF1, as control equipment, and exhausts to S1.

(b) Five (5) thermal spray coating booths, applying powder coatings to metal parts, identified as EU2, EU3, and EU4, constructed in 1987, and EU11 and EU12, constructed in 2009, with a maximum coating capacity of 23.8 pounds of metal powder per hour, each, utilizing a Torit Dust Collector, identified as DC1, as particulate control.

Note: These are currently permitted as dry filters, however; the control is actually a dust collector. In addition, the capacity of these five thermal spray coating booths has been revised to each, instead of combined maximum capacity.

EU2 exhausts to DC1 through vent S2.
EU3 and EU12 exhaust to DC1 through vent S3.
EU4 and EU11 exhaust to DC1 through vent S6.

Under 40 CFR 63, Subpart HHHHHH, these are affected units.

(c) Insignificant activities consisting of the following:

(1) One (1) toluene pretreatment cleaning operation, constructed in 1987, using a toluene based precleaner called Turco pretreat on titanium parts in order to prevent scale formation during the thermal spraying operation, identified as EU5, with a maximum capacity to use approximately 110 gallons of Turco pretreat per year. EU5 uses no control equipment, and exhausts to S4.

(2) One (1) Titanium etching process, constructed in 1986, which uses Nitric Acid, identified as EU7, using approximately 1,155 gallons of 68%-72% Nitric Acid per year, with no control equipment, and exhausting to S4.

(3) Several Laser Cutting Operations, identified together as EU9, constructed in 1988, all laser cutting operations (EU9) are controlled by Baghouse, BH5, and exhaust to S5.

(4) Thirty three (33) gas fired combustion units, identified as EU10, with the Trane units constructed in 2009 and all other units constructed in 2001, with a combined capacity of 8.4 MMBtu/hr, using no controls and venting inside the building. The following table describes the units in more detail:

Equipment ID	**MMBTU/hr rating**
Radiant Heaters, Combustion Research Corp, M/N 0600NG (24 @ 0.24 MMBtu/hr each)	5.76
1 Radiant Heater, Combustion Research Corp, M/N 0800NG	0.13
Radiant Heaters, Combustion Research Corp, M/N 0845NG (2 @ 0.20 MMBtu/hr each)	0.40
1 Radiant Heater, Combustion Reasearch Corp, M/N 0900NG	0.11
HVAC, Trane, M/N YCH300B4HOGA	0.40
HVAC, Trane, M/N YCH108B4HOFA	0.40
2 HVAC, Trane, M/N UCO60C936B	0.20
HVAC, Trane, M/N TWE036C140B0	0.14
Total (33 units)	**8.40**

(5) An acid cleaning department consisting of various steam cleaning and acid immersion tanks. This includes a sodium hydroxide tank, a nitric acid tank, a sodium chromate tank, and a chromic acid/phosphoric acid tank. All acid cleaning activities with the exception of the nitric acid tank for the titanium etching activity (accounted for in emission calculations) result in no VOC or HAP emissions, and are not included in the emission calculations.

(6) Various welding operations, including four (4) semi-automatic TIG welders, eleven (11) TIG line welder, four (4) TIG welding stations, and three (3) MIG welding stations. Maximum electrode usage is 1 pound per hour each for MIG and TIG operations. All welding operations are controlled with various dust collectors.

(7) Various fabrication processes, consisting of forming, sizing, pressing, machining, grinding, cutting and drilling. Various pieces of equipment are located thoughout the

facility to accomplish these tasks. Some of this equipment includes argon fired heat treating furnaces, thermal presses, electric ovens, mills, lathes, drills, grinders, sanders, buffing wheels, and deburring brushes. None of this equipment is expected to generate significant amounts of criteria or HAP pollutants, in addition, many of these emission sources are considered exempt pursuant to 326 IAC 2-1.1-3.

(8) Metal conditioning emissions, including plating, anodizing, and hardening. The plating process consists of a sodium hydroxide tank, a sulfuric acid tank, a nickel strike tank, and a nickel sulfamate tank. None of the materials used in the plating process consist of VOC or HAP emissions.

(9) Non destructive testing of parts for cracks and other defects.

The following is a list of the new emission units:

(a) One (1) thermal spray coating booth, applying powder coatings to metal parts, identified as EU13, approved for construction in 2011, with a maximum coating application capacity of 23.8 pounds of metal coating per hour, exhausting to Torit Dust Collector DC1 through vent S7.

Under 40 CFR 63, Subpart HHHHHH, this is an affected unit

(4) Eleven (11) gas fired combustion units approved for construction in 2011 and, with a combined capacity of 3.83 MMBtu/hr, using no controls and venting inside the building. The following table describes the new units in more detail:

Equipment ID	**MMBTU/hr rating**
HVAC, Trane, M/N TXC064C5HPC0 (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Trane, M/N 2TXC0061AC3HCAA	0.40
HVAC, Carrier, M/N 2TXCC060BC3HCAA (2 @ 0.40 MMBtu/hr each)	0.80
HVAC, Carrier, M/N 48TJE016	0.40
HVAC, Bryant, M/N 580DPV090180ABAA	0.40
HV, Reznor, M/N EEXL225	0.23
HV, Reznor, M/N XL200	0.20
HV, Reznor, M/N F200	0.20
HV, Dayton, M/N 3E230B	0.40
Total (11 units)	**3.83**

The following is a list of emission units removed from the source:

The following gas fired combustion units constructed in 2009, with a combined capacity of 0.34 MMBtu/hr:

(1) 2 HVAC, Trane, M/N UCO60C936B
(2) HVAC, Trane, M/N TWE036C140B0

"Integral Part of the Process" Determination

The Permittee has submitted the following information to justify why the air pollution control equipment,

e.g., Torit Dust Collector, should be considered an integral part of the thermal spray coating booth (EU13) process:

(a) The source claims that the thermal spray booths require accreditation and process specification standards. The Aerospace Industry requires thermal spray booths to achieve and maintain accreditation by the National Aerospace and Defense Contractors Accreditation Program (NADCAP).

(b) For NADCAP accreditation, thermal spray booths must be "illuminated, ventilate, and maintained to prevent contamination". This is accomplished only through the use of the Torit Dust Collectors.

(c) Individual customers require process specifications that require spraying facilities shall be equipped with suitable fume and dust extraction.

(d) The Torit Dust Collector enable visibility during operation, heat loss and fume/dust extraction; all of which would otherwise lead to improper functioning, equipment damage, process contamination and worker/area health and safety issues.

(e) Without the dust collectors, AeroFab would be unable to attain accreditation and proved service from the thermal spray booths to the aerospace industry.

(f) The economic benefit consists of the cost for booth enclosure and installation, dust collection and installation, ducting and installation, gases plumbing an installation, thermal spray gun and installation, robot and installation and annual maintenance for a total of $1,330,000 cost and $6,672,000 in thermal spray booths annual revenue.

IDEM, OAQ has evaluated the information submitted and has determined that the Torit Dust Collector should not be considered an integral part of the thermal spray coating booth (EU13) because the source has not provided justification for the control other than as a control device. The reasons mentioned above are reasons why the source has chosen thermal spray operation. In addition, the economic benefit analysis made was for all the thermal spray booths at the plant, not for the control alone

Therefore, the permitting level will be determined using the potential to emit before the Torit Dust Collector. This determination is effective upon issuance of FESOP No.: 097-30090-00011.

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 – FESOP

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.

Pollutant	Potential To Emit (tons/year)
PM	309.56
PM10[(1)]	309.81
PM2.5	309.81
SO_2	0.03

Pollutant	Potential To Emit (tons/year)
NO_x	9.57
VOC	4.44
CO	1.93

(1) 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".

HAPs	Potential To Emit (tons/year)
Nickel	109.67
Cobalt	86.33
Chromium	82.89
Toluene	1.93
Manganese	1.18
Hexane	0.09
Benzene	negl.
Dichlorobenzene	negl.
Formaldehyde	negl.
Lead	negl.
Cadmium	negl.
TOTAL HAPs	**282.09**

(a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of PM10 and PM2.5 is greater than one hundred (100) tons per year. The PTE of all other regulated criteria pollutants are less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.

(b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is greater than ten (10) tons per year and the PTE of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a FESOP (326 IAC 2-8), because the source will limit emissions of HAPs to less than the Title V major source threshold levels.

PTE of the Entire Source After Issuance of the FESOP

The table below summarizes the potential to emit of the entire source after issuance of this FESOP, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this FESOP, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of FESOP (tons/year)								
	PM	PM10	PM2.5	SO_2	NOx	VOC	CO	Total HAPs	Worst Single HAP
Spray Paint booth (EU1)(DF1)	0.05	0.05	0.05	-	-	2.10	-		
Thermal Spray Coating Booths (EU2, EU3, EU4, EU11, EU12 and E13) (DC1) β	240	90	90	-	-	-	-	23.00	9.00 Nickel 9.00 Chromium 9.00 Cobalt
Toluene Pretreatment (EU5)	-	-	-	-	-	1.13	-	1.01	1.01 Toluene
Titanium Etching (EU7)	-	-	-	-	2.34	-	-	-	-
Laser Cutting (EU9)	0.58	0.58	0.58	-	-	-	-	-	-
Natural Gas-Fire Combustion (EU10)	0.09	0.37	0.37	0.03	4.54	0.27	1.93	0.09	0.09 Hexane
Welding Operation	0.053	0.053	0.053	-	-	-	-	0.002	negl.
Total PTE of Entire Source	**240.77**	**91.05**	**91.05**	**0.03**	**9.57**	**4.44**	**1.93**	**<25**	**<10**
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	NA	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA

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".
β - Limited PTE based on paragraphs below.

(a) FESOP Status

This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this new source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

(1) Combined and Single HAP emission limits for Torit Dust Collection DC-1 are:

HAP	Emission Limit (lb/hr)
Combined HAPs	5.25
Cobalt	2.05
Chromium	2.05
Nickel	2.05

(2) The PM10 and PM2.5 emission limits for Torit Dust Collection DC-1 are:

Baghouse (Unit ID)	PM10 Emission Limit (lbs/hr)	PM2.5 Emission Limit (lbs/hr)
Torit Dust Collector (DC1)	20.5	20.5

Compliance with these limits, combined with the potential to emit PM10, PM2.5 and HAPs from all other emission units at this source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per 12 consecutive month period, each, any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 2-3 (Emission Offset), and 326 IAC 2-1.1-5 (Nonattainment New Source Review) not applicable.

(b) PSD Minor Source
This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit PM is limited to less than 250 tons per year and the potential to emit all other attainment regulated pollutants are less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

Baghouse (Unit ID)	PM Emission Limit (lbs/hr)
Torit Dust Collector (DC1)	54.79

Compliance with this limitation, combined with the potential to emit PM from other emission units at this source, shall limit the source-wide PTE of PM to less than 250 tons per twelve (12) consecutive month period and shall render the requirement of 326 IAC 2-2 not applicable.

(c) Emission Offset Minor Source
This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than ten 2.5 micrometers (PM2.5), is limited to less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

(a) The requirements of the New Source Performance Standard for Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit, since all of the natural gas-fired units have a maximum heat input capacity of less than the threshold of 10 MMBtu per hour.

(b) The requirements of the New Source Performance Standard for Standards of Performance for Surface Coating of Metal Furniture 40 CFR 60, Subpart EE (326 IAC 12), are not included in the permit, since this source does not coat furniture.

(c) The requirements of the New Source Performance Standard for Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, 40 CFR 60, Subpart MM (326 IAC 12), are not included in the permit, since this source only coats aerospace equipment.

(d) The requirements of the New Source Performance Standard for Standards of Performance for Metal Coil Surface Coating, 40 CFR 60, Subpart TT (326 IAC 12), are not included in the permit, since this source does not coat coil.

(e) 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)

(f) This source is subject to the Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR 63.111, Subpart HHHHHH), because the thermal spray coating booths use coatings containing target HAPs (chromium, cobalt, nickel, and manganese).

The units subject to this rule include the following: EU2, EU3, EU4, EU11, EU12, and EU13.

Applicable portions of the NSPS are the following:

(1) 40 CFR 63.11169 (c)
(2) 40 CFR 63.11170 (a)(3)
(3) 40 CFR 63.11170 (b)
(4) 40 CFR 63.11171 (a)-(b)(5)
(5) 40 CFR 63.11171 (e)
(6) 40 CFR 63.11172 (b)
(7) 40 CFR 63.11173 (f)
(8) 40 CFR 63.11174
(9) 40 CFR 63.11175 (a)(1)-(5)(i), (7), (8)(b)(1)-(3)
(10) 40 CFR 63.11176 (a)
(11) 40 CFR 63.11177 (a)
(12) 40 CFR 63.11177 (c)-(d)
(13) 40 CFR 63.11177 (g)-(h)
(14) 40 CFR 63.11178
(15) 40 CFR 63.11179
(16) 40 CFR 63.11180

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

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the thermal spray coatin units except as otherwise specified in 40 CFR 63, Subpart HHHHHH.

In order to comply with 40 CFR 63.11173(e)(2)(i), Owners and operators must demostrate at least 98% capture of paint oversray. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement.

(g) The requirements of the National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63.11, Subpart XXXXXX, are not included in the permit because the source's SIC codes (3444, 3498) are not included in the EPA source category list for the nine metal fabrication and finishing source categories. Although the source engages in welding operations emitting chromium, it does not qualify as one of the nine source categories, rendering this rule not applicable.

(h) 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)

(i) 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 2-8-4 (FESOP)
FESOP applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit of PM, PM10 and PM2.5 are limited to less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

(c) 326 IAC 2-3 (Emission Offset) and (for PM2.5 nonattainment counties) 326 IAC 2-1.1-5 (Nonattainment New Source Review)
Emission Offset and Nonattainment New Source Review applicability is discussed under the PTE of the Entire Source After Issuance of the FESOP section above.

(d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The unlimited potential to emit of HAPs from the new unit is greater than ten (10) tons per year for any single HAP and greater than twenty-five (25) tons per year of a combination of HAPs. However, the source shall limit the potential to emit of HAPs from the new unit to less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1. See PTE of the Entire Source After Issuance of the FESOP Section above.

(e) 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.

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

(1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

These requirements apply pursuant to 326 IAC 5-1-1(a)(5) because the source is located in Marion County, not in the area of Washington Township east of Fall Creek nor the area or Franklin Township south of Thompson Road and east of Five Points Road.

(g) 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.

<u>Paint Booth EU1</u>

(h) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3) (Particulate Emission Limitations for Manufacturing Processes), the source is not subject to 326 IAC 6-3-2, because 326 IAC 6.5-1-2 applies.

(i) 326 IAC 6.5 PM (Limitations Except Lake County)
This source is subject to 326 IAC 6.5 because it is located in Marion County, its PM PTE (or limited PM PTE) is equal to or greater than 100 tons/year or actual emissions are greater than 10 tons/year. However, this source is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. Therefore, 326 IAC 6.5-1-2(a) applies. PM emissions 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))

(j) 326 IAC 8-2 (Surface Coating and Graphic Arts)
The source is located in Marion County and paint booth EU1 was constructed after 1990, however it has a potential to emit and actual emissions of less than 15 pounds of VOC per day, therefore the requirements of 326 IAC 8-2 do not apply.

There are no other 326 IAC 8 rules that apply.

<u>Thermal Spray Booths (EU2, EU3, EU4, EU11, EU 12 and EU13)</u>

(k) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3) (Particulate Emission Limitations for Manufacturing Processes), the source is not subject to 326 IAC 6-3-2, because 326 IAC 6.5-1-2 applies.

(l) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
This source is subject to 326 IAC 6.5 because it is located in Marion County, its PM PTE (or limited PM PTE) is equal to or greater than 100 tons/year or actual emissions are greater than 10 tons/year. However, this source is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. Therefore, 326 IAC 6.5-1-2(a) applies. PM emissions 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)).

(m) 326 IAC 8-2 (Surface Coating and Graphic Arts)
The source is located in Marion County and each spray booths EU2, EU3, EU4, EU11, EU12 and EU13, were constructed after 1990, performs a metal coating process and the source is under the SIC major group 34. However, the thermal spray booths (EU2, EU3, EU4, EU11, EU12 and

EU13) do not use a VOC coating. Therefore, the thermal spray booths are not subject to 326 IAC 8-2-9.

(n) There are no other 326 IAC 8 rules that apply.

(o) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Toluene Pretreatment (EU5)

(p) 326 IAC 8-1 (General VOC Reduction Requirements)
The toluene pretreatment operation has a potential to emit of less than 25 tons of VOC per year, therefore the requirements of 326 IAC 8-1-6 do not apply.

Laser Cutting (EU9)

(q) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3) (Particulate Emission Limitations for Manufacturing Processes), the source is not subject to 326 IAC 6-3-2, because 326 IAC 6.5-1-2 applies.

(r) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
This source is subject to 326 IAC 6.5 because it is located in Marion County, its PM PTE (or limited PM PTE) is equal to or greater than 100 tons/year or actual emissions are greater than 10 tons/year. However, this source is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. Therefore, 326 IAC 6.5-1-2(a) applies. PM emissions 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))

Natural Gas-Fired Units (EU10)

(s) 326 IAC 6-2 (Emission Limitations for Sources of Indirect Heating)
Pursuant to 326 IAC 6-2-1, the source is not subject to 326 IAC 6-2, because EU10 units are not sources for indirect heating.

(t) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
This source is subject to 326 IAC 6.5 because it is located in Marion County, its PM PTE (or limited PM PTE) is equal to or greater than 100 tons/year or actual emissions are greater than 10 tons/year. However, this source is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. Therefore, 326 IAC 6.5-1-2(a) applies. PM emissions 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))

(u) 326 IAC 8-1 (General VOC Reduction Requirements)
The natural as-fired combustion units each have a potential to emit of less than 25 tons of VOC per year, therefore the requirements of 326 IAC 8-1-6 do not apply.

Welding Operations

(v) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3) (Particulate Emission Limitations for Manufacturing Processes), the source is not subject to 326 IAC 6-3-2, because 326 IAC 6.5-1-2 applies.

(w) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
This source is subject to 326 IAC 6.5 because it is located in Marion County, its PM PTE (or limited PM PTE) is equal to or greater than 100 tons/year or actual emissions are greater than 10

tons/year. However, this source is not one of the sources specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. Therefore, 326 IAC 6.5-1-2(a) applies. PM emissions 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))

Compliance Determination, Monitoring and Testing Requirements

(a) The compliance determination and monitoring requirements applicable to this source are as follows:

Emission Unit/Control	Operating Parameters	Frequency
Torit Dust Collector/DC1	Pressure Drop	Once per day
Torit Dust Collector/DC1	Visible Emissions	Once per day

(b) There are no testing requirements applicable to this source.

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 January 6, 2011.

The operation of this source shall be subject to the conditions of the attached proposed FESOP No. 097-30090-00011. The staff recommends to the Commissioner that this FESOP 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

Appendix A: Emission Calculations Summary

Company Name: Aero-Fab
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP No.: F097-30090-00011
Plt ID: 097-00011
Reviewer: Bruce Farrar
Date: January 6, 2011

Uncontrolled Potential Emissions (tons/year)

Emissions Units

	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAP	Single HAP	HAP Name
Spray Paint booth/EU1	0.05	0.05	0.05	-	-	2.10	-	-	-	
Thermal Paint Booths (EU-2, EU-3, EU-4, EU-11, EU-12 and EU-13)	308.79	308.79	308.79	-	-	-	-	280.07	109.67	Nickel
Toluene Pretreatment/EU-5	-	-	-	-	-	2.08	-	1.93	1.93	Toluene
Titanium Etching/EU-7	-	-	-	-	5.04	-	-	-	-	
Laser Cutting/EU-9	0.58	0.58	0.58	-	-	-	-	-	-	
41 Gas-Fired Combustion/EU10	0.09	0.37	0.37	0.03	4.54	0.27	1.93	0.09	0.09	Hexane
Welding	0.05	0.03	0.00	-	-	-	-	0.002	0.002	
Totals	**309.56**	**309.81**	**309.79**	**0.03**	**9.57**	**4.44**	**1.93**	**282.09**		

Limited Emissions (tons/year)

Emissions Units

	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAP	Single HAP	HAP Name
Spray Paint booth/EU1	0.05	0.05	0.05	-	-	2.10	-	-	-	
Thermal Paint Booths (EU-2, EU-3, EU-4, EU-11, EU-12 and EU-13)	240.00	90.00	90.00	-	-	-	-	2.80	1.10	Nickel
Toluene Pretreatment/EU-5	-	-	-	-	-	2.08	-	1.93	1.93	Toluene
Titanium Etching/EU-7	-	-	-	-	5.04	-	-	-	-	
Laser Cutting/EU-9	0.58	0.58	0.58	-	-	-	-	-	-	
41 Gas-Fired Combustion/EU10	0.09	0.37	0.37	0.00	0.00	0.00	0.00	0.00	0.09	Hexane
Welding	0.053	0.053	0.053	-	-	-	-	0.002	0.002	
Totals	**240.77**	**91.05**	**91.05**	**0.00**	**5.04**	**4.18**	**0.00**	**<25**	**<10**	

Appendix A: Emission Calculations
Spray Paint Booth

Company Name: Aero-Fab
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP No.: F097-30090-00011
Plt ID: 097-00011
Reviewer: Bruce Farrar
Date: January 6, 2011

Product	Maximum Capacity (unit/hr)	Application (gal/unit)	Density (lbs/gal)	Volatile Weight (%)	Non-Volatile Solids Volume (%)	Emission Rate (lbs/hr)	VOC Potential (tpy)	PM Potential (tpy)	Transfer Efficiency
Sermetel W	0.367	0.0230	13.74	63.0%	37.0%	0.0731	0.3200	0.0470	75%
Thinner IP 9151	0.367	0.1400	7.90	100.0%	0.0%	0.4059	1.7779	0.0000	75%
TOTAL							**2.0979**	**0.0470**	

Methodology
Maximum Capacity (unit/hr) = calculated from maximums supplied by client; 268 units per month x 12 months per year / 8,760 hours per year
Application (gal/unit) = supplied by client; based on how much product is applied to part
Density (lbs/gal) = as supplied by MSDS
Volatile Weight (%) = as supplied by MSDS
Non-Volatile Solids Volume (%) = as supplied by MSDS
Emission Rate (lbs/hr) = Maximum Capacity (unit/hr) x Application (gal/unit) x Density (lbs/gal) x Volatile Weight (%)
VOC Potential (tpy) = VOC Emissions (lbs/hr) x 8,760 hours per year / 2,000 lbs per ton
PM Potential (tpy) = Maximum Capacity (unit/hr) x Application (gal/unit) x Density (lbs/gal) x Non-Volatile Solids Volume (%) x (1 - Transfer Efficiency) x 8,760 hours per year / 2,000 lbs per ton

Appendix A: Emission Calculations

Thermal Spray Booths (EU-2, EU-3, EU-4, EU-11, EU-12 and EU-13)

Appendix A: **Emission Calculations Summary**
Company Name: Aero-Fab
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP No.: F097-30090-00011
Plt ID: 097-00011
Reviewer: Bruce Farrar
Date: January 6, 2011

Product (Powder) Name	Max. Throughput (lbs/hr)	Transfer Efficiency of Application Equipment (%)	Material Dropout Rate* (%)	PM Emission Rate (lbs/hr)	PM Potential (tpy) per booth	Control Efficiency (%)	Controlled PM Emission Rate (lbs/hr) per booth	controlled PM Potential (tpy) per booth
CO-103	6.0	50%	0%	3.00	13.14	99%	0.03	0.13
443NS	8.6	50%	0%	4.30	18.83	99%	0.04	0.19
CRC-108	2.9	50%	0%	1.45	6.35	99%	0.01	0.06
CO-308-4	6.0	50%	0%	3.00	13.14	99%	0.03	0.13
Total for one booth				**11.75**	**51.47**		**0.12**	**0.51**
Total for six booths booths				**70.5**	**308.79**		**0.71**	**3.09**

Product (Powder) Name	Cobalt Content (wt%)	Chromium Content (wt%)	Manganese Content (wt%)	Nickel Content (wt%)	Cobalt Potential (tpy)	Chromium Potential (tpy)	Manganese Potential (tpy)	Nickel Potential (tpy)	Controlled Cobalt Potential (tpy)	Controlled Chromium Potential (tpy)	Controlled Manganese Potential (tpy)	Controlled Nickel Potential (tpy)
CO-103	56.5%	25.5%	0.0%	10.5%	7.42	3.35	0.00	1.38	0.07	0.03	0.00	0.01
443NS	0.0%	18.0%	0.0%	76.0%	0.00	3.39	0.00	14.31	0.00	0.03	0.00	0.14
CRC-108	0.0%	70.0%	0.0%	20.0%	0.00	4.45	0.00	1.27	0.00	0.04	0.00	0.01
CO-308-4	53.0%	20.0%	1.5%	10.0%	6.96	2.63	0.20	1.31	0.07	0.03	0.00	0.01
Total for one booth					**14.39**	**13.81**	**0.20**	**18.28**	**0.14**	**0.14**	**1.97E-03**	**0.18**
Total for six booths booths					**86.33**	**82.89**	**1.18**	**109.67**	**0.86**	**0.83**	**0.01**	**1.10**

* In some cases, Material Dropout rate (30-40%) is taken into consideration when calculating thermal spray coating booths emissions. However, there is no reliable data related to Dropout rates at this source; therefore, the Dropout rate is conservatively assumed to be 0%.

Methodology

Products selected where the worst-case scenario products in terms of highest HAP concentration and throughput.

Max. Throughput (lbs/hr) = supplied by client

Transfer Efficiency of Application Equipment (%) = average used by IDEM in previous permits; % of product retained on part

Material Dropout Rate (%) = IDEM was unable to find reliable data related to Dropout rates at client and thus a conservative assumption was used; Cornerstone did not find any data that could accurately say otherwise.

PM Emission Rate (lbs/hr) = Max. Throughput (lbs/hr) x Transfer Efficiency of Application Equipment (%) x (1 - Material Dropout Rate [%])

PM Potential (tpy) = PM Emission Rate (lbs/hr) x 8,760 hours per year / 2,000 lbs per ton

Controlled PM Emission Rate (lbs/hr) = Max. Throughput (lbs/hr) x Transfer Efficiency of Application Equipment (%) x (1 - Material Dropout Rate [%]) * (1-Control Efficiency [%])

Controlled PM Potential (tpy) = controlled PM Emission Rate (lbs/hr) x 8,760 hours per year / 2,000 lbs per ton

[HAP] Content (wt%) = supplied by source

[HAP] Potential (tpy) = PM emission Rate (lbs/hr) x [HAP] Content (wt%) x 8,760 hours per year / 2,000 lbs per ton

[HAP] controlled Potential (tpy) = PM emission Rate (lbs/hr) x [HAP] Content (wt%) x 8,760 hours per year / 2,000 lbs per ton

Appendix A: Emission Calculations
Toluene Pretreatment/EU-5

Company Name: Aero-Fab
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP No.: F097-30090-00011
Plt ID: 097-00011
Reviewer: Bruce Farrar
Date: January 6, 2011

Product	Maximum Usage Rate (gal/hr)	VOC Content (lbs/gal)	Emission Rate (lbs/hr)	VOC Potential (tpy)
Turco Pretreatment	0.07	6.78	0.47	2.08

HAP	Density (lbs/gal)	HAP Weight (%)	Emission Rate (lbs/hr)	HAP Potential (tpy)
Toluene	7.41	85.0%	0.44	1.93

Methodology
Maximum Usage Rate (gal/hr) = supplied by client
Density (lbs/gal) = as supplied by MSDS
VOC Content (lbs/gal) = as supplied by MSDS
Emission Rate (lbs/hr) = Maximum Usage Rate (gal/hr) x [Pollutant] Content (lbs/gal)
[Pollutant] Potential (tpy) = Emission Rate (lbs/hr) x 8,760 hours per year / 2,000 lbs per ton

Appendix A: Emission Calculations
Titanium Etching EU-7

Company Name: Aero-Fab
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP No.: F097-30090-00011
Plt ID: 097-00011
Reviewer: Bruce Farrar
Date: January 6, 2011

Product	Maximum Usage (gal/yr)	Density (lbs/gal)	Solution of Nitric Acid (%)	Mole Ratio (NO_2/HNO_3)	Emission Rate (lbs/yr)	NO_X Potential (tpy)
Nitric Acid	1555	12.33	72.0%	0.73	10077.41	5.04

Methodology

Maximum Usage (gal/yr) = supplied by client
Density (lbs/gal) = as supplied by MSDS
Solution of Nitric Acid (%) = Maximum solution of Nitric Acid purchased by client (varies between 68 - 72%)
Mole Ratio (NO_2/HNO_3) = Ratio of Moles Nitrogen Dioxide (NO_2) to Moles Nitric Acid (HNO_3) chemically reactive
Emission Rate (lbs/yr) = Maximum Usage (gal/yr) x Density (lbs/gal) x Solution of Nitric Acid (%) x Mole Ratio (NO_2/HNO_3)
NO_X Potential (tpy) = Emission Rate (lbs/yr) / 2,000 lbs per ton

Appendix A: Emission Calculations
Laser Cutting (EU-9)

Appendix A: **Emission Calculations Summary**
Company Name: Aero-Fab
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP No.: F097-30090-00011
Plt ID: 097-00011
Reviewer: Bruce Farrar
Date: January 6, 2011

Amount of Dust Collected in 1999	950	lbs/year	0.108	lbs/hr
Estimated Actual Operating Hours in 1999	7200	hours/year		
Estimated Baghouse Capture Efficiency	100%			
Estimated Baghouse Control Efficiency	99%			
PM Emissions Before Control	960	lbs/year		
Potential PM Emissions Generated (Scaled up to 8760)	1,168	lbs/year		
	0.584	tons/year		
or:	**0.133**	**lb/hr**		

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

Company Name: Aero-Fab
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP No.: F097-30090-00011
Plt ID: 097-00011
Reviewer: Bruce Farrar
Date: January 6, 2011

Heat Input MMBtu/hr	Potential MMCF/yr	Unit Description
5.76	50.46	Radiant Heaters, Combustion Research Corp, M/N 0600NG (24 @ 0.24 MMBtu/hr each)
0.13	1.14	Radiant Heater, Combustion Research Corp, M/N 0800NG
0.4	3.50	Radiant Heaters, Combustion Research Corp, M/N 0845NG (2 @ 0.20 MMBtu/hr each)
0.1	0.88	Radiant Heater, Combustion Reasearch Corp, M/N 0900NG
0.4	3.50	HVAC, Trane, M/N YCH300B4HOGA
0.4	3.50	HVAC, Trane, M/N YCH108B4HOFA
0.80	7.01	HVAC, Trane, M/N TXC064C5HPC0 (2 @ 0.40 MMBtu/hr each)
0.40	3.50	HVAC, Trane, M/N 2TXC0061AC3HCAA
0.80	7.01	HVAC, Carrier, M/N 2TXCC060BC3HCAA (2 @ 0.40 MMBtu/hr each)
0.40	3.50	HVAC, Carrier, M/N 48TJE016
0.40	3.50	HVAC, Bryant, M/N 580DPV090180ABAA
0.23	1.97	HV, Reznor, M/N EEXL225
0.20	1.75	HV, Reznor, M/N XL200
0.20	1.75	HV, Reznor, M/N F200
0.40	3.50	HV, Dayton, M/N 3E230B
11.02	96.49	

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	94 **see below	5.5	40
Potential Emission in tons/yr	0.09	0.37	0.03	4.54	0.27	1.93

*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 8 for HAPs emissions calculations.

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

Company Name: Aero-Fab
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP No.: F097-30090-00011
Plt ID: 097-00011
Reviewer: Bruce Farrar
Date: January 6, 2011

	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	1.013E-04	5.789E-05	3.618E-03	8.684E-02	1.640E-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	2.412E-05	5.307E-05	6.754E-05	1.833E-05	1.013E-04

Methodology is the same as page 7.

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

Appendix A: Emission Calculations
Weldign Operations

Appendix A: **Emission Calculations Summary**
Company Name: Aero-Fab
Address City IN Zip: 604 East LeGrande, Indianapolis, IN 46203
FESOP No.: F097-30090-00011
Plt ID: 097-00011
Reviewer: Bruce Farrar
Date: January 6, 2011

Various welding operations, including 4 semi-automatic TIG welders, 1 TIG line welder, 11 TIG welding stations, and 4 MIG welding stations. The 4 MIG welding stations have a combined maximum capacity to use 1 pound of electrode per hour. All welding operations are controlled with various dust collectors.

Potential Emissions Calculation

Type of Welding	MIG	TIG
Type of Electrode/Consumable	ER70S-3	N/D
Maximum Electrode Usage [lb/hr] (1) =	1	1
Percent of Electrode Converted to Fume [%] (2) =	0.6%	0.6%
Percent of Manganese in Fume [%] (2) =	7.7%	N/A
Potential PM/PM_{10} Emissions [lb/hr] (3) =	0.006	0.006
Potential Manganese Emissions [lb/hr] (4) =	0.0005	N/A
Potential PM/PM_{10} Emissions [tpy] (5) =	**0.026**	**0.026**
Potential Manganese Emissions [tpy] (6) =	**0.002**	**N/A**

Methodology

(1) MIG: Maximum Electrode Usage [lb/hr] = Maximum Electrode Usage (2,000 lb every 3 mo x 4) / 8,760 hr/yr
Assumed TIG maximum electrode usage to be the same as MIG.
(2) Percent of electrode converted to fume and percent of manganese in fume were obtained from the "Guide for Estimating Welding Emissions for EPA and Ventilation Permit Reporting" published by the American Welding Society. Used factors for ER70S-3. Assumed that TIG welding produces the same amount of fume as MIG welding.
(3) Potential PM/PM_{10} Emissions [lb/hr] = Maximum Electrode Usage [lb/hr] x Percent of Electrode Converted to Fume [%]
(4) Potential Manganese Emissions [lb/hr] = Potential PM/PM_{10} Emissions [lb/hr] x Percent of Manganese in Fume [%]
(5) Potential PM/PM_{10} Emissions [tpy] = Potential PM/PM_{10} Emissions [lb/hr] x 8,760 hr/yr / 2,000 lb/ton
(6) Potential Manganese Emissions [tpy] = Potential Manganese Emissions [lb/hr] x 8,760 hr/yr / 2,000 lb/ton

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

April 27, 2011

Mr. Dan Seybert
Aerofab, Division of Tube Processing Corporation
604 E LeGrande Ave
Indianapolis, IN 46203-3907

Re: Public Notice
Aerofab, Division of Tube Processing Corporation
Permit Level: New Source FESOP
Permit Number: 097 - 30090 - 00011

Dear Mr. Seybert:

Enclosed is a copy of your draft New Source FESOP, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has submitted the draft permit package to the Indianapolis Marion Co. Pub. Lib. Shelby St Branch, 2502 Shelby St. in Indianapolis IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper. The OAQ has requested that the Indianapolis Star in Indianapolis, IN publish this notice no later than May 2, 2011.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Bruce Farrar, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-5401 or dial (317) 234-5401.

Sincerely,

Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter. dot 3/27/08

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ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

April 27, 2011

Indianapolis Star
Attn: Classifieds
307 North Pennsylvania
Indianapolis, Indiana 46204

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Aerofab, Division of Tube Processing Corporation, Marion County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than May 2, 2011.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: New Source FESOP
Permit Number: 097 - 30090 - 00011

Enclosure
PN Newspaper.dot 3/27/08

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

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Governor

Thomas W. Easterly
Commissioner

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

April 27, 2011

To: Indianapolis Marion Co. Pub. Lib. Shelby St Branch

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Aerofab, Division of Tube Processing Corporation
Permit Number: 097 - 30090 - 00011

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 03/27/08

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Governor

Thomas W. Easterly
Commissioner

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

Notice of Public Comment

April 27, 2011
Aerofab, Division of Tube Processing Corporation
097 - 30090 - 00011

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 3/27/08

Mail Code 61-53

IDEM Staff	LPOGOST 4/27/2011 Aero Fab Div of Tube Processing Corp. 097 - 30090 - 00011 (draft)			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		Dan Seybert Aero_Fab Div of Tube Processing Corp. 604 E LeGrande Ave Indianapolis IN 46203-3907 (Source CAATS)									
2		Indianapolis Marion Co. Pub. Lib. Shelby St Branch 2502 Shelby St. Indianapolis IN 46203 *(Library)*									
3		Marion County Health Department 3838 N, Rural St Indianapolis IN 46205-2930 *(Health Department)*									
4		Mrs. Sandra Lee Watson 7834 E 100 S Marion IN 46953 *(Affected Party)*									
5		Indianapolis City Council and Mayors Office 200 East Washington Street, Room E Indianapolis IN 46204 *(Local Official)*									
6		Marion County Commissioners 200 E. Washington St. City County Bldg., Suite 801 Indianapolis IN 46204 *(Local Official)*									
7		Ms. Kathy Watson 8204 Claridge Rd Indianapolis IN 46260 *(Affected Party)*									
8		Matt Mosier Office of Sustainability 2700 South Belmont Ave. Administration Bldg. Indianapolis IN 46221 *(Local Official)*									
9		Adam Estes Cornerstone Environmental, Health & Safety, Inc. 880 Lennox Court Zionsville IN 46077 *(Consultant)*									
10		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 *(Affected Party)*									
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