



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: August 24, 2011

RE: Manchester Tank and Equipment Company / 093 - 30518 - 00010

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

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER.dot12/03/07



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## Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Manchester Tank and Equipment Company**  
**905 "X" Street**  
**Bedford, Indiana 47421**

(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.: F093-30518-00010	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: August 24, 2011 Expiration Date: August 24, 2016

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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 metal pressure vessel manufacturing plant.

Source Address:	905 "X" Street, Bedford, Indiana 47421
General Source Phone Number:	(812) 278-5102
SIC Code:	3443 (Fabricated Plate Work (Boiler Shops))
County Location:	Lawrence
Source Location Status:	Attainment for all 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)]

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

- (a) Spray Coating Operations, including the following:
- (1) One (1) paint spray booth, identified as #7, constructed in 1987, for coating metal tanks, utilizing an air atomization system, with a maximum material usage rate of eleven and eighty hundredths (11.80) gallons per day, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C4;
  - (2) One (1) paint spray booth, identified as PP1, constructed in July 2001, utilizing an air atomization system, for coating metal tanks, with a maximum material usage rate of forty-five and ninety-two hundredths (45.92) gallons per day, using dry filters for particulate matter overspray control, and exhausting to two (2) stacks, identified as PP-01 and PP-02;
- (b) Powder Coating Operations, including the following:
- (1) One (1) Continuous Powder Coating System, identified as the Mainlines Powder Coat System, for applying coatings to metal pressure vessels (aka tanks), consisting of one (1) electrostatic powder paint booth, identified as PB1, approved for construction in 2011, equipped with two (2) electrostatic hand-held spray applicators, with a maximum throughput capacity of forty-five (45) tanks per hour and a maximum material usage of two and sixty-three hundredths (2.63) pounds of powder paint per tank, using fabric filters to control particulate emissions, and exhausting to two (2) stacks PB1-S1 and PB1-S2; and
  - (2) One (1) Batch Powder Coating System, identified as the Big Tank Lines Powder Coat System, for applying coatings to metal pressure vessels (aka tanks), including one (1) batch down draft electrostatic powder paint booth, identified as PB2, approved for construction in 2011, equipped with one (1) electrostatic hand-held spray applicator, with a maximum throughput capacity of one and thirty-

three hundredths (1.33) tanks per hour and a maximum material usage of eight and ninety hundredths (8.90) pounds of powder paint per tank, using fabric filters to control particulate emissions, and exhausting to stacks PB2-S1 and PB2-S2.

- (c) One (1) pneumatic blasting operation, identified as SB1, constructed in 2001, using a dust collector equipped with dry filters for particulate control, and exhausting to one (1) stack, identified as SB-01; and

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the pneumatic blasting operation is considered an affected facility.

- (d) One (1) metal oxyfuel/plasma cutting machine, identified as PC-1, constructed in 2005, used for cutting mild steel, aluminum and stainless steel, using six (6) cartridge filters for particulate control, and exhausting inside the building.

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the metal oxyfuel/plasma cutting machine is considered an affected facility.

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) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
- (1) Two (2) water heaters, identified as Water Heater #1 and Water Heater #2, constructed in 1987, with a maximum heat input capacity of one and five tenths (1.5) million British thermal units (MMBtu) per hour, each, uncontrolled and exhausting to stacks WH-1 and WH-2, respectively; [326 IAC 6-2]
  - (2) One (1) natural gas-fired bake oven, identified as Bk01, constructed in 2001, for drying the coated tanks from spray booth PP1, with a maximum heat input capacity of one and sixty-five hundredths (1.65) million British thermal units (MMBtu) per hour, uncontrolled and exhausting to two (2) stacks, identified as Bk-01 and Bk-02;
  - (3) One (1) natural gas-fired dry-off oven, identified as NDO1, constructed in 1987, with a maximum heat input capacity of five tenths (0.5) million British thermal units (MMBtu) per hour, uncontrolled and exhausting one (1) stack, identified as NDO-01;
  - (4) One (1), five (5) stage washer, serving the Mainlines Powder Coat System, approved for construction in 2011, equipped with two (2) natural gas-fired burners, identified as WS-1 and WS-3, with a maximum heat input capacity of one and thirty-five hundredths (1.35) MMBtu/hr, each, uncontrolled, and exhausting to stacks WS-S1, WH-S1, WS-S3, and WH-S3, respectively; [326 IAC 6-2]
  - (5) One (1) steam jenny washer, serving the Big Tank Lines Powder Coat System, approved for construction in 2011, equipped with one (1) natural gas-fired burner, identified as SJ1, with a maximum heat input capacity of thirty-six hundredths (0.36) MMBtu/hr, uncontrolled, and exhausting to stack SJ-S1; [326 IAC 6-2]
  - (6) One (1) dry-off oven, serving the Mainlines Powder Coat System, approved for construction in 2011, equipped with one (1) natural gas-fired burner, identified as

- COB-1, with a maximum heat input capacity of one and twelve hundredths (1.12) MMBtu/hr, uncontrolled, and exhausting to stack CO-S1;
- (7) One (1) cure oven, serving the Mainlines Powder Coat System, approved for construction in 2011, equipped with two (2) natural gas-fired burners, identified as CO-1 and CO-2, with maximum heat input capacities of one and thirty-eight hundredths (1.38) and two (2.00) MMBtu/hr, respectively, uncontrolled, and exhausting to stack CO-S1;
  - (8) One (1) batch cure oven, serving the Big Tank Lines Powder Coat System, approved for construction in 2011, equipped with one (1) natural gas-fired burner, identified as BO1, with a maximum heat input capacity of one and twenty hundredths (1.20) MMBtu/hr, uncontrolled, and exhausting to stack BO-S1;
  - (9) Three (3) natural gas-fired comfort heaters, identified as Comfort Heater #1, Comfort Heater #2, and Comfort Heater #3, constructed in 1987, with a maximum heat input capacity of one hundred twenty thousandths (0.120) million British thermal units (MMBtu) per hour, each, uncontrolled and exhausting inside the building;
  - (10) One (1) natural gas-fired comfort heater, identified as Comfort Heater #4, constructed in 1987, with a maximum heat input capacity of six and six tenths (6.6) million British thermal units (MMBtu) per hour, uncontrolled and exhausting inside the building;
  - (11) Three (3) natural gas-fired comfort heaters, identified as Comfort Heater #5, Comfort Heater #6, and Comfort Heater #7, constructed in 2001, with a maximum heat input capacity of ninety thousandths (0.090) million British thermal units (MMBtu) per hour, each, uncontrolled and exhausting inside the building;
  - (12) One (1) natural gas-fired comfort heater, identified as Comfort Heater #8, constructed in 2001, with a maximum heat input capacity of four hundred ninety-five thousandths (0.495) million British thermal units (MMBtu) per hour, uncontrolled and exhausting inside the building;
  - (13) One (1) natural gas-fired comfort heater, identified as Comfort Heater #9, constructed in 2010, with a maximum heat input capacity of forty thousandths (0.040) million British thermal units (MMBtu) per hour, uncontrolled and exhausting inside the building; and
  - (14) One (1) natural gas-fired comfort heater, identified as Comfort Heater #10, constructed in 2010, with a maximum heat input capacity of one hundred thousandths (0.100) million British thermal units (MMBtu) per hour, uncontrolled and exhausting inside the building.
- (b) Aerosol spray paint operations, using hand-held aerosol cans for touch-up purposes and marking steel for ASME code purposes, with VOC emissions less than fifteen (15) pounds per day, are uncontrolled, and are conducted both inside and outside the building;
  - (c) One (1), five (5)-gallon paint pot, constructed in 2002, for coating metal tanks, equipped with one (1) hand-held paint gun and one (1) hand-held wand with a 360° circular tip for applying surface coatings at a maximum primer and finish coat application rate of seventy-eight thousandths (0.078) and seventy-nine thousandths (0.079) gallons per hour, respectively, (less than five (5.0) gallons of coating per day), uncontrolled and exhausting inside the building;

(d) Degreasing operations performed using an aqueous-based phosphate cleaner, consisting of one (1) aqueous parts washer, identified as NW1 and exhausting to four (4) stacks, identified as NW-01 through NW-04;

(e) One (1) multi-gas laser trimmer, with a maximum cutting capacity of thirteen (13) pounds of steel per hour, controlled by a baghouse with an air flow rate less than four thousand (4000) cubic feet per minute (cfm);

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the metal machining operations are considered an affected facility.

(f) One (1) Whitney cutting machine with PM10 emissions less than twenty-five (25) pounds per day; [326 IAC 6-3-1(b)(14)]

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the metal machining operations are considered an affected facility;

(g) One (1) plate burner with PM10 emissions less than twenty-five (25) pounds per day; [326 IAC 6-3-1(b)(14)]

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the metal machining operations are considered an affected facility.

(h) Four (4) plasma/oxy-fuel head burners with PM10 emissions less than twenty-five (25) pounds per day; [326 IAC 6-3-1(b)(14)]

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the metal machining operations are considered an affected facility.

(i) Handheld plasma/oxy-fuel torches with PM10 emissions less than twenty-five (25) pounds per day; [326 IAC 6-3-1(b)(14)]

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the metal machining operations are considered an affected facility.

(j) Metal machining where an aqueous cutting coolant continuously floods the machining interface;

(k) The following equipment related to manufacturing activities resulting in the emission of HAPs below insignificant emission levels: brazing equipment, cutting torches, soldering equipment, and welding equipment;

(1) Welding operations with PM10 emission less than twenty-five (25) pounds per day. [326 IAC 6-3-1(b)(14)]

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the metal machining operations are considered an affected facility.

(l) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;

- (m) Combustion source flame safety purging on startup;
- (n) Process vessel degassing and cleaning to prepare internal repairs;
- (o) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;
- (p) One (1) fork lift operation utilizing multiple forklifts with PM10 emissions less than twenty-five (25) pounds per day; [326 IAC 6-3-1(b)(14)] and
- (q) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

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]

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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)]

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- (a) This permit, F093-30518-00010, 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]

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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 [326 IAC 2-8-6] [IC 13-17-12]

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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)]

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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)]

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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)]

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- (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)]

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- (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 July 1 of each year to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, 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) If required by specific condition(s) in Section D of this permit, 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, or Southwest Regional Office 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  
Southwest Regional Office phone: (812) 380-2305; fax: (812) 380-2304.

- (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]**

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- (a) All terms and conditions of permits established prior to F093-30518-00010 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)]**

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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]**

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- (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)]**

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- (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 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than one hundred (100) pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed five hundred fifty-one thousandths (0.551) pounds per hour.

#### C.2 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) and greenhouse gases (GHGs), 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.
- (4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) 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 two hundred fifty (250) 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.3 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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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.7 Stack Height [326 IAC 1-7]

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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.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (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 demolitions 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.9 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.10 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

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- (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.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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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.14 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.15 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.16 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.17 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.18 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.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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 [326 IAC 2-8-4(10)]: Spray Coating

- (a) Spray Coating Operations, including:
- (1) One (1) paint spray booth, identified as #7, constructed in 1987, for coating metal tanks, utilizing an air atomization system, with a maximum material usage rate of eleven and eighty hundredths (11.80) gallons per day, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C4;
  - (2) One (1) paint spray booth, identified as PP1, constructed in July 2001, utilizing an air atomization system, for coating metal tanks, with a maximum material usage rate of forty-five and ninety-two hundredths (45.92) gallons per day, using dry filters for particulate matter overspray control, and exhausting to two (2) stacks, identified as PP-01 and PP-02;

(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 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), the Permittee shall not allow the discharge into the atmosphere VOC from paint spray booth #7 in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for air dried, forced warm air dried, or extreme performance coatings.
- (b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations), the Permittee shall not allow the discharge into the atmosphere VOC from paint spray booth PP1 in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator for air dried, forced warm air dried, or extreme performance coatings.

#### D.1.2 Volatile Organic Compounds (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from all mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:

- (a) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers;
- (b) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials;
- (c) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials;
- (d) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes; and

- (e) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

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

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Pursuant to 326 IAC 6-3-2(d), particulate from paint spray booths #7 and PP1 shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate the control device(s) in accordance with manufacturer's specifications.

**D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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A Preventive Maintenance Plan is required for this facility and any associated control device(s). 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.1.5 Volatile Organic Compounds (VOC)[ 326 IAC 8-1-2] [326 IAC 8-1-4]**

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Compliance with the VOC content limits contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

**D.1.6 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint spray booth stack(s) C4, PP-01, and PP-02 while the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

**D.1.7 Record Keeping Requirements**

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- (a) To document the compliance status with Conditions D.1.1(a) and D.1.1(b), the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1(a) and D.1.1(b). Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used less water.

- (2) The amount of coating material and solvent used on a monthly basis.
  - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections. 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 [326 IAC 2-8-4(10)]: Powder Coating

(b) Powder Coating Operations, including:

- (1) One (1) Continuous Powder Coating System, identified as the Mainlines Powder Coat System, for applying coatings to metal pressure vessels (aka tanks), consisting of one (1) electrostatic powder paint booth, identified as PB1, approved for construction in 2011, equipped with two (2) electrostatic hand-held spray applicators, with a maximum throughput capacity of forty-five (45) tanks per hour and a maximum material usage of two and sixty-three hundredths (2.63) pounds of powder paint per tank, using fabric filters to control particulate emissions, and exhausting to two (2) stacks PB1-S1 and PB1-S2; and
- (2) One (1) Batch Powder Coating System, identified as the Big Tank Lines Powder Coat System, for applying coatings to metal pressure vessels (aka tanks), including one (1) batch down draft electrostatic powder paint booth, identified as PB2, approved for construction in 2011, equipped with one (1) electrostatic hand-held spray applicator, with a maximum throughput capacity of one and thirty-three hundredths (1.33) tanks per hour and a maximum material usage of eight and ninety hundredths (8.90) pounds of powder paint per tank, using fabric filters to control particulate emissions, and exhausting to stacks PB2-S1 and PB2-S2.

(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.2.1 PSD PM Limits [326 IAC 2-2]

In order to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

- (a) PM emissions from electrostatic powder paint booth PB1 shall not exceed two and ninety-six hundredths (2.96) pounds of PM per hour; and
- (b) PM emissions from electrostatic powder paint booth PB2 shall not exceed thirty hundredths (0.30) pounds of PM per hour.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than two hundred fifty (250) tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### D.2.2 FESOP PM10 and PM2.5 Limits [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following limits:

- (a) PM10 emissions from electrostatic powder paint booth PB1 shall not exceed one and forty-eight hundredths (1.48) pounds of PM10 per hour;
- (b) PM2.5 emissions from electrostatic powder paint booth PB1 shall not exceed one and forty-eight hundredths (1.48) pounds of PM2.5 per hour;
- (c) PM10 emissions from electrostatic powder paint booth PB2 shall not exceed fifteen hundredths (0.15) pounds of PM10 per hour; and

- (d) PM2.5 emissions from electrostatic powder paint booth PB2 shall not exceed fifteen hundredths (0.15) pounds of PM2.5 per hour.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5, 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 one hundred (100) tons per twelve (12) consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits) not applicable.

#### D.2.3 Particulate Limits [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the each of the processes listed in the table below shall not exceed the corresponding pound per hour limitations, as follows:

Emission Unit	Process Weight Rate		Allowable Emission Rate (lb/hour)
	(lbs/hr)	(tons/hr)	
electrostatic powder paint booth PB1 (per each spray gun)	9,753	4.88	11.85
electrostatic powder paint booth PB2	19,509	9.75	18.86

These limitations were calculated as follows:

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

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

#### D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for this facility and its control device. 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.2.5 Particulate Control (PM, PM10, and PM2.5)

In order to demonstrate compliance with Conditions D.2.1, D.2.2, and D.2.3, particulate from electrostatic powder paint booths PB1 and PB2 shall be controlled by dry particulate filters and the Permittee shall operate the control device(s) in accordance with manufacturer's specifications.

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

#### D.2.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from each of the electrostatic powder paint booths while the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

### **D.2.7 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.2.6, the Permittee shall maintain a log of weekly overspray observations, and daily inspections. 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).
  
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-8-4(10)]: Pneumatic Blasting

- (c) One (1) pneumatic blasting operation, identified as SB1, constructed in 2001, using a dust collector equipped with dry filters for particulate control, and exhausting to one (1) stack, identified as SB-01.

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the pneumatic blasting operation is considered an affected facility.

(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.3.1 PSD PM Limit [326 IAC 2-2]

In order to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

- (a) PM emissions from the pneumatic blasting operation (SB1) shall not exceed one and twenty-four hundredths (1.24) pounds of PM per hour.

Compliance with this limit, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than two hundred fifty (250) tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### D.3.2 FESOP PM10 and PM2.5 Limits [326 IAC 2-8-4] [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 (FESOP), and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following limits:

- (1) PM10 emissions from the pneumatic blasting operation (SB1) shall not exceed one and seven hundredths (1.07) pounds of PM10 per hour; and
- (2) PM2.5 emissions from the pneumatic blasting operation shall not exceed one and seven hundredths (1.07) pounds of PM2.5 per hour.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5, 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 one hundred (100) tons per twelve (12) consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits) not applicable.

#### D.3.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the pneumatic blasting operation, identified as SB1, shall not exceed twenty-two and seventy hundredths (22.70) pounds per hour when operating at a process weight rate of twelve and eighty-six hundredths (12.86) tons per hour (or 25,723 lbs/hr). The pound per hour limitation was calculated as follows:

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

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

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

#### D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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A Preventive Maintenance Plan is required for this facility and its control device. 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.3.5 Particulate Control

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- (a) In order to comply with Conditions D.3.1, D.3.2, and D.3.3, the dust collector for particulate control shall be in operation and control emissions from the pneumatic blasting operation (SB1) at all times the pneumatic blasting operation (SB1) is in operation.
- (b) In the event that bag failure is observed in a multi-compartment dust collector, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the 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 results of any response actions taken up to the time of notification.

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

#### D.3.6 Parametric Monitoring

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The Permittee shall record the pressure drop across the dust collector used in conjunction with the pneumatic blasting operation (SB1), at least once per day when the pneumatic blasting operation (SB1) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of three (3.0) and six (6.0) inches of water, or a range established during the latest stack test, the Permittee shall take a 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 response 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 once every six (6) months.

#### D.3.7 Visible Emissions Notations

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- (a) Weekly visible emission notations of the pneumatic blasting operation (SB1) stack exhaust (stack SB-01) shall be performed 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 a 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. Failure to take response steps shall be considered a deviation from this permit.

#### D.3.8 Broken or Failed Bag Detection (Mandatory for operations with a baghouse)

- (a) For a single compartment dust collector 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 dust collector 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 emissions unit. 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)] [326 IAC 2-8-16]**

#### D.3.9 Record Keeping Requirements

- (a) To document the compliance status with Condition D.3.6, the Permittee shall maintain daily records of the pressure drop across the dust collector controlling the pneumatic blasting operation (SB1). 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).
- (b) To document the compliance status with Condition D.3.7, the Permittee shall maintain weekly records of the visible emission notations of the pneumatic blasting operation (SB1) stack exhaust. The Permittee shall include in its weekly 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).
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
- (1) Two (2) water heaters, identified as Water Heater #1 and Water Heater #2, constructed in 1987, with a maximum heat input capacity of one and five tenths (1.5) million British thermal units (MMBtu) per hour, uncontrolled and exhausting inside the building; [326 IAC 6-2]
  - (5) One (1), five (5) stage washer, serving the Mainlines Powder Coat System, approved for construction in 2011, equipped with two (2) natural gas-fired burners, identified as WS-1 and WS-3, with a maximum heat input capacity of one and thirty-five hundredths (1.35) MMBtu/hr, each, uncontrolled, and exhausting to stacks WS-S1, WH-S1, WS-S3 and WH-S3, respectively; [326 IAC 6-2] and
  - (6) One (1) steam jenny washer, serving the Big Tank Lines Powder Coat System, approved for construction in 2011, equipped with one (1) natural gas-fired burner, identified as SJ1, with a maximum heat input capacity of thirty-six hundredths (0.36) MMBtu/hr, uncontrolled, and exhausting to stack SJ-S1; [326 IAC 6-2]

(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.4.1 Particulate Emissions [326 IAC 6-2-4]

- (1) Pursuant to 326 IAC 6-2-4(a) (Particulate Emissions for Source of Indirect Heating), the total particulate emissions from the two (2) natural gas-fired water heaters, identified as Water Heater #1 and Water Heater #2, shall be less than six tenths (0.6) pounds per million British thermal units (lb/MMBtu) heat input, each.
- (2) Pursuant to 326 IAC 6-2-4(a) (Particulate Emissions for Source of Indirect Heating), the total particulate emissions from the three (3) natural gas-fired burners, identified as WS-1, WS-3, and SJ1, shall be less than six tenths (0.6) pounds per million British thermal units (lb/MMBtu) heat input, each.

## SECTION E.1 NESHAP REQUIREMENTS

**Emissions Unit Description [326 IAC 2-8-4(10)]:** Pneumatic Blasting, and Metal Cutting, Machining, and Welding.

- (b) One (1) pneumatic blasting operation, identified as SB1, constructed in 2001, using a dust collector equipped with dry filters for particulate control, and exhausting to one (1) stack, identified as SB-01;

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the pneumatic blasting operation is considered an affected facility.

- (c) One (1) metal oxyfuel/plasma cutting machine, identified as PC-1, constructed in 2005, used for cutting mild steel, aluminum, and stainless steel, controlled by six (6) cartridge filters and exhausting inside the building;

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the metal oxyfuel/plasma cutting machine is considered an affected facility.

### Insignificant Activities

- (e) One (1) multi-gas laser trimmer, with a maximum cutting capacity of thirteen (13) pounds of steel per hour, controlled by a baghouse with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and an air flow rate less than four thousand (4000) cubic feet per minute (cfm);

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the multi-gas laser trimmer is considered an affected facility.

- (f) One (1) Whitney cutting machine with PM10 emissions less than twenty-five (25) pounds per day; [326 IAC 6-3-1(b)(14)]

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the metal machining operations are considered an affected facility;

- (g) One (1) plate burner with PM10 emissions less than twenty-five (25) pounds per day; [326 IAC 6-3-1(b)(14)]

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the plate burner is considered an affected facility.

- (h) Four (4) plasma/oxy-fuel head burners with PM10 emissions less than twenty-five (25) pounds per day; [326 IAC 6-3-1(b)(14)]

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the metal machining operations are considered an affected facility.

- (i) Handheld plasma/oxy-fuel torches with PM10 emissions less than twenty-five (25) pounds per day; [326 IAC 6-3-1(b)(14)]

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the metal machining operations are considered an affected facility.

(k) The following equipment related to manufacturing activities resulting in the emission of HAPs below insignificant emission levels: brazing equipment, cutting torches, soldering equipment, and welding equipment;

(1) Welding operations with PM10 emission less than twenty-five (25) pounds per day. [326 IAC 6-3-1(b)(14)]

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the welding operations are considered an affected facility.

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

#### **National Emission Standards for Hazardous Air Pollutants (NESHAPs) Requirements [326 IAC 2-8-4(1)]**

E.1.1 General Provisions Relating to the National Emission Standards for Hazardous Air Pollutants (NESHAPs): Area Source Standards for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63, Subpart XXXXXX), [326 IAC 20-1] [40 CFR Part 63, Subpart A]

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

E.1.2 National Emission Standards for Hazardous Air Pollutants (NESHAPs): Area Source Standards for Nine Metal Fabrication and Finishing Source Categories [40 CFR 63, Subpart XXXXXX] [326 IAC 20]

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Pursuant to 40 CFR 63.11514(a), the Permittee, that owns or operates a facility that is primarily engaged in the operations in one of the nine source categories listed in 40 CFR 63.11514(a)(1) through (9), that is an area source of metal fabrication or finishing metal hazardous air pollutant (MFHAP) emissions, as defined in 40 CFR 63.11522, shall comply with the following provisions of 40 CFR Part 63, Subpart XXXXXX (included as Attachment A of this permit), with a compliance date of July 25, 2011:

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Manchester Tank and Equipment Company  
Source Address: 905 "X" Street, Bedford, Indiana 47421  
FESOP Permit No.: F093-30518-00010

**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: Manchester Tank and Equipment Company  
Source Address: 905 "X" Street, Bedford, Indiana 47421  
FESOP Permit No.: F093-30518-00010

**This form consists of 2 pages**

**Page 1 of 2**

<p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• 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</li><li>• 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</li></ul>
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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, PM10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , 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: Manchester Tank and Equipment Company  
Source Address: 905 "X" Street, Bedford, Indiana 47421  
FESOP Permit No.: F093-30518-00010

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

Page 1 of 2

<p>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 "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**Federally Enforceable  
State Operating Permit  
(FESOP)  
OFFICE OF AIR QUALITY**

**Manchester Tank and Equipment Company  
905 X Street,  
Bedford, Indiana, 47421**

**Attachment A**

**Title 40: Protection of Environment**

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

**Subpart XXXXXX - Area Source Standards for Nine Metal Fabrication  
and Finishing Source Categories**

**F093-30518-00010**

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

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

**Applicability and Compliance Dates**

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

- (a) You are subject to this subpart if you own or operate an area source that is primarily engaged in the operations in one of the nine source categories listed in paragraphs (a)(1) through (9) of this section. Descriptions of these source categories are shown in Table 1 of this subpart. "Primarily engaged" is defined in §63.11522, "What definitions apply to this subpart?"
- (1) Electrical and Electronic Equipment Finishing Operations;
  - (2) Fabricated Metal Products;
  - (3) Fabricated Plate Work (Boiler Shops);
  - (4) Fabricated Structural Metal Manufacturing;
  - (5) Heating Equipment, except Electric;
  - (6) Industrial Machinery and Equipment Finishing Operations;
  - (7) Iron and Steel Forging;
  - (8) Primary Metal Products Manufacturing; and
  - (9) Valves and Pipe Fittings.
- (b) The provisions of this subpart apply to each new and existing affected source listed and defined in paragraphs (b)(1) through (5) of this section if you use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent for carcinogens, as defined by OSHA at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for non-carcinogens. For the MFHAP, this corresponds to materials that contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material.
- (1) A dry abrasive blasting affected source is the collection of all equipment and activities necessary to perform dry abrasive blasting operations which use materials that contain MFHAP or that have the potential to emit MFHAP.
  - (2) A machining affected source is the collection of all equipment and activities necessary to perform machining operations which use materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or that have the potential to emit MFHAP.
  - (3) A dry grinding and dry polishing with machines affected source is the collection of all equipment and activities necessary to perform dry grinding and dry polishing with machines operations which use materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or have the potential to emit MFHAP.
  - (4) A spray painting affected source is the collection of all equipment and activities necessary to perform spray-applied painting operations using paints which contain MFHAP. A spray painting affected source includes all equipment used to apply cleaning materials to a substrate to prepare it for paint application (surface preparation) or to remove dried paint; to apply a paint to a substrate (paint application) and to dry or cure the paint after application; or to clean paint operation equipment (equipment cleaning).

Affected source(s) subject to the requirements of this paragraph are not subject to the miscellaneous surface coating provisions of subpart HHHHHH of this part, "National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources."

- (5) A welding affected source is the collection of all equipment and activities necessary to perform welding operations which use materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or have the potential to emit MFHAP.
- (c) An affected source is existing if you commenced construction or reconstruction of the affected source, as defined in §63.2, "General Provisions" to part 63, before April 3, 2008.
- (d) An affected source is new if you commenced construction or reconstruction of the affected source, as defined in §63.2, "General Provisions" to part 63, on or after April 3, 2008.
- (e) This subpart does not apply to research or laboratory facilities, as defined in section 112(c)(7) of the Clean Air Act (CAA).
- (f) This subpart does not apply to tool or equipment repair operations, facility maintenance, or quality control activities as defined in §63.11522, "What definitions apply to this subpart?"
- (g) This subpart does not apply to operations performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such state), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.
- (h) This subpart does not apply to operations that produce military munitions, as defined in §63.11522, "What definitions apply to this subpart?", manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such state), or equipment directly and exclusively used for the purposes of transporting military munitions.
- (i) You are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided you are not otherwise required by law to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a). Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart.

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

- (a) If you own or operate an existing affected source, you must achieve compliance with the applicable provisions in this subpart by July 25, 2011.
- (b) If you own or operate a new affected source, you must achieve compliance with the applicable provisions in this subpart by July 23, 2008, or upon startup of your affected source, whichever is later.

**Standards and Compliance Requirements**

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

- (a) *Dry abrasive blasting standards.* If you own or operate a new or existing dry abrasive blasting affected source, you must comply with the requirements in paragraphs (a)(1) through (3) of this section, as applicable, for each dry abrasive blasting operation that uses materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. These requirements do not apply when abrasive blasting operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.
  - (1) *Standards for dry abrasive blasting of objects performed in totally enclosed and unvented blast chambers.* If you own or operate a new or existing dry abrasive blasting affected source which consists of an abrasive blasting chamber that is totally enclosed and unvented, as defined in §63.11522, "What definitions apply to this subpart?", you must implement management practices to minimize emissions of MFHAP. These

management practices are the practices specified in paragraph (a)(1)(i) and (ii) of this section.

- (i) You must minimize dust generation during emptying of abrasive blasting enclosures; and
  - (ii) You must operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions.
- (2) *Standards for dry abrasive blasting of objects performed in vented enclosures.* If you own or operate a new or existing dry abrasive blasting affected source which consists of a dry abrasive blasting operation which has a vent allowing any air or blast material to escape, you must comply with the requirements in paragraphs (a)(2)(i) and (ii) of this section. Dry abrasive blasting operations for which the items to be blasted exceed 8 feet (2.4 meters) in any dimension, may be performed subject to the requirements in paragraph (a)(3) of this section.
- (i) You must capture emissions and vent them to a filtration control device. You must operate the filtration control device according to manufacturer's instructions, and you must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by the requirements in §63.11519(c)(4), "What are my notification, recordkeeping, and reporting requirements?"
  - (ii) You must implement the management practices to minimize emissions of MFHAP as specified in paragraphs (a)(2)(ii)(A) through (C) of this section.
    - (A) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
    - (B) You must enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials; and
    - (C) You must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.
- (3) *Standards for dry abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension.* If you own or operate a new or existing dry abrasive blasting affected source which consists of a dry abrasive blasting operation which is performed on objects greater than 8 feet (2.4 meters) in any one dimension, you may implement management practices to minimize emissions of MFHAP as specified in paragraph (a)(3)(i) of this section instead of the practices required by paragraph (a)(2) of this section. You must demonstrate that management practices are being implemented by complying with the requirements in paragraphs (a)(3)(ii) through (iv) of this section.
- (i) Management practices for dry abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension are specified in paragraphs (a)(3)(i)(A) through (E) of this section.
    - (A) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
    - (B) You must enclose abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive material; and
    - (C) You must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions; and
    - (D) You must not re-use dry abrasive blasting media unless contaminants (i.e., any material other than the base metal, such as paint residue) have been removed by filtration or screening, and the abrasive material conforms to its original size; and

- (E) Whenever practicable, you must switch from high particulate matter (PM)-emitting blast media (e.g., sand) to low PM-emitting blast media (e.g., crushed glass, specular hematite, steel shot, aluminum oxide), where PM is a surrogate for MFHAP.
- (ii) You must perform visual determinations of fugitive emissions, as specified in §63.11517(b), "What are my monitoring requirements?", according to paragraphs (a)(3)(ii)(A) or (B) of this section, as applicable.
  - (A) For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed outdoors, you must perform visual determinations of fugitive emissions at the fenceline or property border nearest to the outdoor dry abrasive blasting operation.
  - (B) For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed indoors, you must perform visual determinations of fugitive emissions at the primary vent, stack, exit, or opening from the building containing the abrasive blasting operations.
- (iii) You must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in §63.11519(c)(2), "What are my notification, recordkeeping, and reporting requirements?"
- (iv) If visible fugitive emissions are detected, you must perform corrective actions until the visible fugitive emissions are eliminated, at which time you must comply with the requirements in paragraphs (a)(3)(iv)(A) and (B) of this section.
  - (A) You must perform a follow-up inspection for visible fugitive emissions in accordance with §63.11517(a), "Monitoring Requirements."
  - (B) You must report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, with your annual certification and compliance report as required by §63.11519(b)(5), "Notification, recordkeeping, and reporting requirements."
- (b) *Standards for machining.* If you own or operate a new or existing machining affected source, you must implement management practices to minimize emissions of MFHAP as specified in paragraph (b)(1) and (2) of this section for each machining operation that uses materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. These requirements do not apply when machining operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP.
  - (1) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
  - (2) You must operate all equipment associated with machining according to manufacturer's instructions.
- (c) *Standards for dry grinding and dry polishing with machines.* If you own or operate a new or existing dry grinding and dry polishing with machines affected source, you must comply with the requirements of paragraphs (c)(1) and (2) of this section for each dry grinding and dry polishing with machines operation that uses materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. These requirements do not apply when dry grinding and dry polishing operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP.
  - (1) You must capture emissions and vent them to a filtration control device. You must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by the

- requirements in §63.11519(c)(4), "Notification, recordkeeping, and reporting Requirements."
- (2) You must implement management practices to minimize emissions of MFHAP as specified in paragraphs (c)(2)(i) and (ii) of this section.
- (i) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable;
  - (ii) You must operate all equipment associated with the operation of dry grinding and dry polishing with machines, including the filtration control device, according to manufacturer's instructions.
- (d) *Standards for control of MFHAP in spray painting.* If you own or operate a new or existing spray painting affected source, as defined in §63.11514 (b)(4), "Am I subject to this subpart?," you must implement the management practices in paragraphs (d)(1) through (9) of this section when a spray-applied paint that contains MFHAP is being applied. These requirements do not apply when spray-applied paints that do not contain MFHAP are being applied.
- (1) *Standards for spray painting for MFHAP control.* All spray-applied painting of objects must meet the requirements of paragraphs (d)(1)(i) through (iii) of this section. These requirements do not apply to affected sources located at Fabricated Structural Metal Manufacturing facilities, as described in Table 1, "Description of Source Categories Affected by this Subpart," or affected sources that spray paint objects greater than 15 feet (4.57 meters), that are not spray painted in spray booths or spray rooms.
- (i) Spray booths or spray rooms must have a full roof, at least two complete walls, and one or two complete side curtains or other barrier material so that all four sides are covered. The spray booths or spray rooms must be ventilated so that air is drawn into the booth and leaves only through the filter. The roof may contain narrow slots for connecting fabricated products to overhead cranes, and/or for cords or cables.
  - (ii) All spray booths or spray rooms must be fitted with a type of filter technology that is demonstrated to achieve at least 98 percent capture of MFHAP. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see §63.14). The test coating for measuring filter efficiency shall be a high-solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-High Volume Low Pressure) air-atomized spray gun operating at 40 psi air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement.
  - (iii) You must perform regular inspection and replacement of the filters in all spray booths or spray rooms according to manufacturer's instructions, and maintain documentation of these activities, as detailed in §63.11519(c)(5), "Notification, recordkeeping, and reporting requirements."
  - (iv) As an alternative compliance requirement, spray booths or spray rooms equipped with a water curtain, called "waterwash" or "waterspray" booths or spray rooms that are operated and maintained according to the manufacturer's specifications and that achieve at least 98 percent control of MFHAP, may be used in lieu of the spray booths or spray rooms requirements of paragraphs (d)(1)(i) through (iii) of this section.
- (2) *Standards for spray painting application equipment of all objects painted for MFHAP control.* All paints applied via spray-applied painting must be applied with a high-volume,

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

- (3) *Spray system recordkeeping.* You must maintain documentation of the HVLP or other high transfer efficiency spray paint delivery methods, as detailed in §63.11519(c)(7), "Notification, recordkeeping, and reporting requirements."
- (4) *Spray gun cleaning.* All cleaning of paint spray guns must be done with either non-HAP gun cleaning solvents, or in such a manner that an atomized mist of spray of gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent. Spray gun cleaning may be done with, for example, by hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of these non-atomizing methods may also be used.
- (5) *Spray painting worker certification.* All workers performing painting must be certified that they have completed training in the proper spray application of paints and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (d)(6) of this section. The spray application of paint is prohibited by persons who are not certified as having completed the training described in paragraph (d)(6) of this section. The requirements of this paragraph do not apply to the students of an accredited painting training program who are under the direct supervision of an instructor who meets the requirements of this paragraph. The requirements of this paragraph do not apply to operators of robotic or automated painting operations.
- (6) *Spray painting training program content.* Each owner or operator of an affected spray painting affected source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply paints are trained in the proper application of paints as required by paragraph (d)(5) of this section. The training program must include, at a minimum, the items listed in paragraphs (d)(6)(i) through (iii) of this section.
  - (i) A list of all current personnel by name and job description who are required to be trained;
  - (ii) Hands-on, or in-house or external classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (d)(6)(ii)(A) through (D) of this section.
    - (A) Spray gun equipment selection, set up, and operation, including measuring paint viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
    - (B) Spray technique for different types of paints to improve transfer efficiency and minimize paint usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.
    - (C) Routine spray booth and filter maintenance, including filter selection and installation.

- (D) Environmental compliance with the requirements of this subpart.
- (iii) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Alternatively, owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (d)(6)(ii) of this section are not required to provide the initial training required by that paragraph to these painters.
- (7) *Records of spray painting training.* You must maintain records of employee training certification for use of HVLP or other high transfer efficiency spray paint delivery methods as detailed in §63.11519(c)(8), "Notification, recordkeeping, and reporting requirements."
- (8) *Spray painting training dates.* As required by paragraph (d)(5) of this section, all new and existing personnel at an affected spray painting affected source, including contract personnel, who spray apply paints must be trained by the dates specified in paragraphs (d)(8)(i) and (ii) of this section.
- (i) If your source is a new source, all personnel must be trained and certified no later than January 20, 2009, 180 days after startup, or 180 days after hiring, whichever is later. Training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in paragraph (d)(6)(ii) of this section satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.
- (ii) If your source is an existing source, all personnel must be trained and certified no later than July 25, 2011, or 180 days after hiring, whichever is later. Worker training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in paragraph (d)(6)(ii) of this section, satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.
- (9) *Duration of training validity.* Training and certification will be valid for a period not to exceed 5 years after the date the training is completed. All personnel must receive refresher training that meets the requirements of this section and be re-certified every 5 years.
- (e) [Reserved]
- (f) *Standards for welding.* If you own or operate a new or existing welding affected source, you must comply with the requirements in paragraphs (f)(1) and (2) of this section for each welding operation that uses materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. If your welding affected source uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), you must demonstrate that management practices or fume control measures are being implemented by complying with the requirements in paragraphs (f)(3) through (8) of this section. The requirements in paragraphs (f)(1) through (8) of this section do not apply when welding operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.
- (1) You must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. You must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, as specified by the requirements in §63.11519(c)(4), "Notification, recordkeeping, and reporting requirements."
- (2) You must implement one or more of the management practices specified in paragraphs (f)(2)(i) through (v) of this section to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment.

- (i) Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)—also called metal inert gas welding (MIG));
  - (ii) Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;
  - (iii) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;
  - (iv) Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and
  - (v) Use a welding fume capture and control system, operated according to the manufacturer's specifications.
- (3) *Tier 1 compliance requirements for welding.* You must perform visual determinations of welding fugitive emissions as specified in §63.11517(b), "Monitoring requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations. You must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in §63.11519(c)(2), "Notification, recordkeeping, and reporting requirements."
- (4) *Requirements upon initial detection of visible emissions from welding.* If visible fugitive emissions are detected during any visual determination required in paragraph (f)(3) of this section, you must comply with the requirements in paragraphs (f)(4)(i) and (ii) of this section.
- (i) Perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with paragraph (f)(2) of this section. After completing such corrective actions, you must perform a follow-up inspection for visible fugitive emissions in accordance with §63.11517(a), "Monitoring Requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations.
  - (ii) Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, and submit with your annual certification and compliance report as required by §63.11519(b)(5), "Notification, recordkeeping, and reporting requirements."
- (5) *Tier 2 requirements upon subsequent detection of visible emissions.* If visible fugitive emissions are detected more than once during any consecutive 12 month period (notwithstanding the results of any follow-up inspections), you must comply with paragraphs (f)(5)(i) through (iv) of this section.
- (i) Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, you must conduct a visual determination of emissions opacity, as specified in §63.11517(c), "Monitoring requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations.
  - (ii) In lieu of the requirement of paragraph (f)(3) of this section to perform visual determinations of fugitive emissions with EPA Method 22, you must perform visual determinations of emissions opacity in accordance with §63.11517(d), "Monitoring Requirements," using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
  - (iii) You must keep a record of each visual determination of emissions opacity performed in accordance with paragraphs (f)(5)(i) or (ii) of this section, along with any subsequent corrective action taken, in accordance with the requirements in §63.11519(c)(3), "Notification, recordkeeping, and reporting requirements."

- (iv) You must report the results of all visual determinations of emissions opacity performed in accordance with paragraphs (f)(5)(i) or (ii) of this section, along with any subsequent corrective action taken, and submit with your annual certification and compliance report as required by §63.11519(b)(6), "Notification, recordkeeping, and reporting requirements."
- (6) *Requirements for opacities less than or equal to 20 percent but greater than zero.* For each visual determination of emissions opacity performed in accordance with paragraph (f)(5) of this section for which the average of the six-minute average opacities recorded is 20 percent or less but greater than zero, you must perform corrective actions, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with paragraph (f)(2) of this section.
- (7) *Tier 3 requirements for opacities exceeding 20 percent.* For each visual determination of emissions opacity performed in accordance with paragraph (f)(5) of this section for which the average of the six-minute average opacities recorded exceeds 20 percent, you must comply with the requirements in paragraphs (f)(7)(i) through (v) of this section.
  - (i) You must submit a report of exceedence of 20 percent opacity, along with your annual certification and compliance report, as specified in §63.11519(b)(8), "Notification, recordkeeping, and reporting requirements," and according to the requirements of §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."
  - (ii) Within 30 days of the opacity exceedence, you must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in paragraph (f)(8) of this section. If you have already prepared a Site-Specific Welding Emissions Management Plan in accordance with this paragraph, you must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.
  - (iii) During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, you must continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in §63.11517(d), "Monitoring Requirements," using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
  - (iv) You must maintain records of daily visual determinations of emissions opacity performed in accordance with paragraph (f)(7)(iii) of this section, during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with the requirements in §63.11519(b)(9), "Notification, recordkeeping, and reporting requirements."
  - (v) You must include these records in your annual certification and compliance report, according to the requirements of §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."
- (8) *Site-Specific Welding Emissions Management Plan.* The Site-Specific Welding Emissions Management Plan must comply with the requirements in paragraphs (f)(8)(i) through (iii) of this section.
  - (i) Site-Specific Welding Emissions Management Plan must contain the information in paragraphs (f)(8)(i)(A) through (F) of this section.
    - (A) Company name and address;
    - (B) A list and description of all welding operations which currently comprise the welding affected source;
    - (C) A description of all management practices and/or fume control methods in place at the time of the opacity exceedence;

- (D) A list and description of all management practices and/or fume control methods currently employed for the welding affected source;
  - (E) A description of additional management practices and/or fume control methods to be implemented pursuant to paragraph (f)(7)(ii) of this section, and the projected date of implementation; and
  - (F) Any revisions to a Site-Specific Welding Emissions Management Plan must contain copies of all previous plan entries, pursuant to paragraphs (f)(8)(i)(D) and (E) of this section.
- (ii) The Site-Specific Welding Emissions Management Plan must be updated annually to contain current information, as required by paragraphs (f)(8)(i)(A) through (C) of this section, and submitted with your annual certification and compliance report, according to the requirements of §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."
  - (iii) You must maintain a copy of the current Site-Specific Welding Emissions Management Plan in your records in a readily-accessible location for inspector review, in accordance with the requirements in §63.11519(c)(12), "Notification, recordkeeping, and reporting requirements."

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

- (a) *Visual determination of fugitive emissions, general.* Visual determination of fugitive emissions must be performed according to the procedures of EPA Method 22, of 40 CFR part 60, Appendix A-7. You must conduct the EPA Method 22 test while the affected source is operating under normal conditions. The duration of each EPA Method 22 test must be at least 15 minutes, and visible emissions will be considered to be present if they are detected for more than six minutes of the fifteen minute period.
- (b) *Visual determination of fugitive emissions, graduated schedule.* Visual determinations of fugitive emissions must be performed in accordance with paragraph (a) of this section and according to the schedule in paragraphs (b)(1) through (4) of this section.
  - (1) *Daily Method 22 Testing.* Perform visual determination of fugitive emissions once per day, on each day the process is in operation, during operation of the process.
  - (2) *Weekly Method 22 Testing.* If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests, performed in accordance with paragraph (b)(1) of this section for 10 days of work day operation of the process, you may decrease the frequency of EPA Method 22 testing to once every five days of operation of the process (one calendar week). If visible fugitive emissions are detected during these tests, you must resume EPA Method 22 testing of that operation once per day during each day that the process is in operation, in accordance with paragraph (b)(1) of this section.
  - (3) *Monthly Method 22 Testing.* If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed in accordance with paragraph (b)(2) of this section, you may decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, you must resume weekly EPA Method 22 in accordance with paragraph (b)(2) of this section.
  - (4) *Quarterly Method 22 Testing.* If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with paragraph (b)(3) of this section, you may decrease the frequency of EPA Method 22 testing to once per 60 days of operation of the process (3 calendar months). If visible fugitive emissions are detected during these tests, you must resume monthly EPA Method 22 in accordance with paragraph (b)(3) of this section.
- (c) *Visual determination of emissions opacity for welding Tier 2 or 3, general.* Visual determination of emissions opacity must be performed in accordance with the procedures of EPA Method 9, of 40

CFR part 60, Appendix A–4, and while the affected source is operating under normal conditions. The duration of the EPA Method 9 test shall be thirty minutes.

- (d) *Visual determination of emissions opacity for welding Tier 2 or 3, graduated schedule.* You must perform visual determination of emissions opacity in accordance with paragraph (c) of this section and according to the schedule in paragraphs (d)(1) through (5) of this section.
- (1) *Daily Method 9 testing for welding, Tier 2 or 3.* Perform visual determination of emissions opacity once per day during each day that the process is in operation.
  - (2) *Weekly Method 9 testing for welding, Tier 2 or 3.* If the average of the six minute opacities recorded during any of the daily consecutive EPA Method 9 tests performed in accordance with paragraph (d)(1) of this section does not exceed 20 percent for 10 days of operation of the process, you may decrease the frequency of EPA Method 9 testing to once per five days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, you must resume testing every day of operation of the process according to the requirements of paragraph (d)(1) of this section.
  - (3) *Monthly Method 9 testing for welding Tier 2 or 3.* If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (d)(2) of this section does not exceed 20 percent for four consecutive weekly tests, you may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, you must resume testing every five days of operation of the process according to the requirements of paragraph (d)(2) of this section.
  - (4) *Quarterly Method 9 testing for welding Tier 2 or 3.* If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (d)(3) of this section does not exceed 20 percent for three consecutive monthly tests, you may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, you must resume testing every 21 days (month) of operation of the process according to the requirements of paragraph (d)(3) of this section.
  - (5) *Return to Method 22 testing for welding, Tier 2 or 3.* If, after two consecutive months of testing, the average of the six minute opacities recorded during any of the monthly EPA Method 9 tests performed in accordance with paragraph (d)(3) of this section does not exceed 20 percent, you may resume EPA Method 22 testing as in paragraphs (b)(3) and (4) of this section. In lieu of this, you may elect to continue performing EPA Method 9 tests in accordance with paragraphs (d)(3) and (4) of this section.

**§ 63.11518 [Reserved]**

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

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

- (iii) An identification of the relevant standard (i.e., this subpart); and
  - (iv) A brief description of the type of operation. For example, a brief characterization of the types of products (e.g., aerospace components, sports equipment, etc.), the number and type of processes, and the number of workers usually employed.
- (2) *Notification of compliance status.* If you are the owner or operator of an existing affected source, you must submit a notification of compliance status on or before November 22, 2011. If you are the owner or operator of a new affected source, you must submit a notification of compliance status within 120 days after initial startup, or by November 20, 2008, whichever is later. You are required to submit the information specified in paragraphs (a)(2)(i) through (iv) of this section with your notification of compliance status:
- (i) Your company's name and address;
  - (ii) A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart;
  - (iii) If you operate any spray painting affected sources, the information required by §63.11516(e)(3)(vi)(C), "Compliance demonstration," or §63.11516(e)(4)(ix)(C), "Compliance demonstration," as applicable; and
  - (iv) The date of the notification of compliance status.
- (b) *What reports must I prepare or submit?*
- (1) *Annual certification and compliance reports.* You must prepare and submit annual certification and compliance reports for each affected source according to the requirements of paragraphs (b)(2) through (7) of this section. The annual certification and compliance reporting requirements may be satisfied by reports required under other parts of the CAA, as specified in paragraph (b)(3) of this section.
- (2) *Dates.* Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), "General Provisions," you must prepare and submit each annual certification and compliance report according to the dates specified in paragraphs (b)(2)(i) through (iii) of this section. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- (i) The first annual certification and compliance report must cover the first annual reporting period which begins the day after the compliance date and ends on December 31.
  - (ii) Each subsequent annual certification and compliance report must cover the subsequent semiannual reporting period from January 1 through December 31.
  - (iii) Each annual certification and compliance report must be prepared and submitted no later than January 31 and kept in a readily-accessible location for inspector review. If an exceedence has occurred during the year, each annual certification and compliance report must be submitted along with the exceedence reports, and postmarked or delivered no later than January 31.
- (3) *Alternate dates.* For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, "Title V."
- (i) If the permitting authority has established dates for submitting annual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), "Title V," you may prepare or submit, if required, the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (b)(2)(iii) of this section.

- (ii) If an affected source prepares or submits an annual certification and compliance report pursuant to this section along with, or as part of, the monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), "Title V," and the compliance report includes all required information concerning exceedences of any limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same exceedences in the annual monitoring report. However, submission of an annual certification and compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.
- (4) *General requirements.* The annual certification and compliance report must contain the information specified in paragraphs (b)(4)(i) through (iii) of this section, and the information specified in paragraphs (b)(5) through (7) of this section that is applicable to each affected source.
  - (i) Company name and address;
  - (ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and
  - (iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.
- (5) *Visual determination of fugitive emissions requirements.* The annual certification and compliance report must contain the information specified in paragraphs (b)(5)(i) through (iii) of this section for each affected source which performs visual determination of fugitive emissions in accordance with §63.11517(a), "Monitoring requirements."
  - (i) The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;
  - (ii) A description of the corrective actions taken subsequent to the test; and
  - (iii) The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.
- (6) *Visual determination of emissions opacity requirements.* The annual certification and compliance report must contain the information specified in paragraphs (b)(6)(i) through (iii) of this section for each affected source which performs visual determination of emissions opacity in accordance with §63.11517(c), "Monitoring requirements."
  - (i) The date of every visual determination of emissions opacity;
  - (ii) The average of the six-minute opacities measured by the test; and
  - (iii) A description of any corrective action taken subsequent to the test.
- (7) [Reserved]
- (8) *Exceedences of 20 percent opacity for welding affected sources.* As required by §63.11516(f)(7)(i), "Requirements for opacities exceeding 20 percent," you must prepare an exceedence report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20 percent. This report must be submitted along with your annual certification and compliance report according to the requirements in paragraph (b)(1) of this section, and must contain the information in paragraphs (b)(8)(iii)(A) and (B) of this section.
  - (A) The date on which the exceedence occurred; and
  - (B) The average of the six-minute average opacities recorded during the visual determination of emissions opacity.

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

(c) *What records must I keep?*

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

- (1) *General compliance and applicability records.* Maintain information specified in paragraphs (c)(1)(i) through (ii) of this section for each affected source.
- (i) Each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report.
  - (ii) Records of the applicability determinations as in §63.11514(b)(1) through (5), "Am I subject to this subpart," listing equipment included in its affected source, as well as any changes to that and on what date they occurred, must be maintained for 5 years and be made available for inspector review at any time.
- (2) *Visual determination of fugitive emissions records.* Maintain a record of the information specified in paragraphs (c)(2)(i) through (iii) of this section for each affected source which performs visual determination of fugitive emissions in accordance with §63.11517(a), "Monitoring requirements."
- (i) The date and results of every visual determination of fugitive emissions;
  - (ii) A description of any corrective action taken subsequent to the test; and
  - (iii) The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.
- (3) *Visual determination of emissions opacity records.* Maintain a record of the information specified in paragraphs (c)(3)(i) through (iii) of this section for each affected source which performs visual determination of emissions opacity in accordance with §63.11517(c), "Monitoring requirements."
- (i) The date of every visual determination of emissions opacity; and
  - (ii) The average of the six-minute opacities measured by the test; and
  - (iii) A description of any corrective action taken subsequent to the test.
- (4) Maintain a record of the manufacturer's specifications for the control devices used to comply with §63.11516, "What are my standards and management practices?"
- (5) *Spray paint booth filter records.* Maintain a record of the filter efficiency demonstrations and spray paint booth filter maintenance activities, performed in accordance with §63.11516(d)(1)(ii) and (iii), "Requirements for spray painting objects in spray booths or spray rooms."
- (6) *Waterspray booth or water curtain efficiency tests.* Maintain a record of the water curtain efficiency demonstrations performed in accordance with §63.11516(d)(1)(ii), "Requirements for spray painting objects in spray booths or spray rooms."
- (7) *HVLP or other high transfer efficiency spray delivery system documentation records.* Maintain documentation of HVLP or other high transfer efficiency spray paint delivery systems, in compliance with §63.11516(d)(3), "Requirements for spray painting of all objects." This documentation must include the manufacturer's specifications for the equipment and any manufacturer's operation instructions. If you have obtained written approval for an alternative spray application system in accordance with §63.11516(d)(2),

- “Spray painting of all objects,” you must maintain a record of that approval along with documentation of the demonstration of equivalency.
- (8) *HVLP or other high transfer efficiency spray delivery system employee training documentation records.* Maintain certification that each worker performing spray painting operations has completed the training specified in §63.11516(d)(6), “Requirements for spray painting of all objects,” with the date the initial training and the most recent refresher training was completed.
- (9) [Reserved]
- (10) [Reserved]
- (11) *Visual determination of emissions opacity performed during the preparation (or revision) of the Site-Specific Welding Emissions Management Plan.* You must maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific Welding Emissions Management Plan, in accordance with §63.11516(f)(7)(iii), “Requirements for opacities exceeding 20 percent.”
- (12) *Site-Specific Welding Emissions Management Plan.* If you have been required to prepare a plan in accordance with §63.11516(f)(7)(iii), “Site-Specific Welding Emissions Management Plan,” you must maintain a copy of your current Site-Specific Welding Emissions Management Plan in your records and it must be readily available for inspector review.
- (13) *Manufacturer's instructions.* If you comply with this subpart by operating any equipment according to manufacturer's instruction, you must keep these instructions readily available for inspector review.
- (14) *Welding Rod usage.* If you operate a new or existing welding affected source which is not required to comply with the requirements of §63.11516(f)(3) through (8) because it uses less than 2,000 pounds per year of welding rod (on a rolling 12-month basis), you must maintain records demonstrating your welding rod usage on a rolling 12-month basis.
- (15) Your records must be maintained according to the requirements in paragraphs (c)(14)(i) through (iii) of this section.
- (i) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1), “General Provisions.” Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
- (ii) As specified in §63.10(b)(1), “General Provisions,” you must keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record.
- (iii) You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record according to §63.10(b)(1), “General Provisions.” You may keep the records off-site for the remaining 3 years.

**§ 63.11520 [Reserved]**

**Other Requirements and Information**

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

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

- (b) In delegating implementation and enforcement authority of this subpart to a state, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are retained by the EPA Administrator and are not transferred to the state, local, or tribal agency.
- (c) The authorities that cannot be delegated to state, local, or tribal agencies are specified in paragraphs (c)(1) through (5) of this section.
- (1) Approval of an alternative non-opacity emissions standard under §63.6(g), of the General Provisions of this part.
  - (2) Approval of an alternative opacity emissions standard under §63.6(h)(9), of the General Provisions of this part.
  - (3) Approval of a major change to test methods under §63.7(e)(2)(ii) and (f), of the General Provisions of this part. A “major change to test method” is defined in §63.90.
  - (4) Approval of a major change to monitoring under §63.8(f), of the General Provisions of this part. A “major change to monitoring” under is defined in §63.90.
  - (5) Approval of a major change to recordkeeping and reporting under §63.10(f), of the General Provisions of this part. A “major change to recordkeeping/reporting” is defined in §63.90.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

*Paint* means a material applied to a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, coatings, sealants, liquid plastic coatings, caulks,

inks, adhesives, and maskants. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances, or paper film or plastic film which may be pre-coated with an adhesive by the film manufacturer, are not considered paints for the purposes of this subpart.

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

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

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

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

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

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

- (1) Paints applied from a hand-held device with a paint cup capacity that is less than 3.0 fluid ounces (89 cubic centimeters).
- (2) Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.
- (3) Painting operations that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; the application of paints that contain fillers that adversely affect atomization with HVLP spray guns, and the application of paints that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).
- (4) Thermal spray operations (also known as metallizing, flame spray, plasma arc spray, and electric arc spray, among other names) in which solid metallic or non-metallic material is heated to a molten or semi-molten state and propelled to the work piece or substrate by compressed air or other gas, where a bond is produced upon impact.

*Spray booth or spray room* means an enclosure with four sides and a roof where spray paint is prevented from leaving the booth during spraying by the enclosure. The roof of the spray booth or spray

room may contain narrow slots for connecting the parts and products to overhead cranes, or for cord or cable entry into the spray booth or spray room.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Resource**

EPA Nine Metal Fabrication and Finishing Source Categories Brochure: <http://www.epa.gov/ttn/atw/area/metfabb.pdf>

**Reference**

The US EPA Electronic Code of Federal Regulations - 40 CFR 63, Subpart XXXXXX—National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories weblink: <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr;sid=5cc4021f75f8411ea22d298d1764c524;rgn=div6;view=text;node=40%3A14.0.1.1.33;idno=40;cc=ecfr>



No changes have been made to the permit as a result of the above-listed correction.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Ms. Hannah Desrosiers 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) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov)

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

Technical Support Document (TSD) for a Part 70 Operating Permit  
Transitioning to a Federally Enforceable State Operating Permit (FESOP)  
with New Source Review (NSR)

**Source Description and Location**

**Source Name:** Manchester Tank and Equipment Company  
**Source Location:** 905 "X" Street, Bedford, Indiana 47421  
**County:** Lawrence  
**SIC Code:** 3443 (Fabricated Plate Work (Boiler Shops))  
**Operation Permit No.:** F093-30518-00010  
**Permit Reviewer:** Hannah L. Desrosiers

On October 21, 2010, the Office of Air Quality (OAQ) received an application from Manchester Tank and Equipment Company related to the construction and operation of new emission units at an existing stationary metal pressure vessel manufacturing plant, and transition from a Part 70 Operating Permit to a Federally Enforceable State Operating Permit (FESOP).

**Existing Approvals**

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

- (a) First Administrative Amendment No.: 093-25553-00010, issued on January 2, 2008.
- (b) Review Request No.: 093-23454-00010, issued on August 16, 2006.
- (c) Part 70 Operating Permit Renewal No.: T093-20665-00010, issued on July 24, 2006.

Due to this application, the source is transitioning from a Part 70 Operating Permit to a FESOP.

**County Attainment Status**

The source is located in Lawrence County. The following attainment status designations are applicable to Lawrence County:

Pollutant	Designation
SO2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O3	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM10	Unclassifiable effective November 15, 1990.
PM2.5	Unclassifiable or attainment effective April 5, 2005.
NO2	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (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. Lawrence County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) PM2.5  
Lawrence County has been classified as attainment for PM2.5. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions. These rules became effective on July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.
- (c) Other Criteria Pollutants  
Lawrence County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

#### **Fugitive Emissions**

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 Manchester Tank and Equipment Company on October 21, 2010, relating to the transition of a Part 70 Operating Permit to a Federally Enforceable State Operating Permit (FESOP), and the construction and operation of a new powder coating operation. The new powder coating operation will consist of two (2), electrostatic powder coating booths and accompanying wash units, dry-off ovens, and bake ovens.

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

- (a) Spray Coating Operations, including:
- (1) One (1) paint spray booth, identified as #7, constructed in 1987, for coating metal tanks, utilizing an air atomization system, with a maximum material usage rate of eleven and eighty hundredths (11.80) gallons per day, using dry filters for particulate matter overspray control, and exhausting to one (1) stack, identified as C4.
  - (2) One (1) paint spray booth, identified as PP1, constructed in July 2001, utilizing an air atomization system, for coating metal tanks, with a maximum material usage rate of forty-five and ninety-two hundredths (45.92) gallons per day, using dry filters for particulate matter overspray control, and exhausting to two (2) stacks, identified as PP-01 and PP-02.
- (b) One (1) pneumatic blasting operation, identified as SB1, constructed in 2001, using a dust collector equipped with dry filters for particulate control, and exhausting to one (1) stack, identified as SB-01.

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the pneumatic blasting operation is considered an affected facility.

- (c) One (1) metal oxyfuel/plasma cutting machine, identified as PC-1, constructed in 2005, used for cutting mild steel, aluminum and stainless steel, using six (6) cartridge filters for particulate control, and exhausting inside the building;

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the metal oxyfuel/plasma cutting machine is considered an affected facility.

- (d) Insignificant activities consisting of the following:

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

- (A) Two (2) water heaters, identified as Water Heater #1 and Water Heater #2, constructed in 1987, with a maximum heat input capacity of one and five tenths (1.5) million British thermal units (MMBtu) per hour, each, uncontrolled and exhausting to stacks WH-1 and WH-2, respectively; [326 IAC 6-2]
- (B) One (1) natural gas-fired bake oven, identified as Bk01, constructed in 2001, for drying the coated tanks from spray booth PP1, with a maximum heat input capacity of one and sixty-five hundredths (1.65) million British thermal units (MMBtu) per hour, uncontrolled and exhausting to two (2) stacks, identified as Bk-01 and Bk-02;
- (C) One (1) natural gas-fired dry-off oven, identified as NDO1, constructed in 1987, with a maximum heat input capacity of five tenths (0.5) million British thermal units (MMBtu) per hour, uncontrolled and exhausting one (1) stack, identified as NDO-01;
- (D) Three (3) natural gas-fired comfort heaters, identified as Comfort Heater #1, Comfort Heater #2, and Comfort Heater #3, constructed in 1987, with a maximum heat input capacity of one hundred twenty thousandths (0.120) million British thermal units (MMBtu) per hour, each, uncontrolled and exhausting inside the building;
- (E) One (1) natural gas-fired comfort heater, identified as Comfort Heater #4, constructed in 1987, with a maximum heat input capacity of six and six tenths (6.6) million British thermal units (MMBtu) per hour, uncontrolled and exhausting inside the building.
- (F) Three (3) natural gas-fired comfort heaters, identified as Comfort Heater #5, Comfort Heater #6, and Comfort Heater #7, constructed in 2001, with a maximum heat input capacity of ninety thousandths (0.090) million British thermal units (MMBtu) per hour, each, uncontrolled and exhausting inside the building;
- (G) One (1) natural gas-fired comfort heater, identified as Comfort Heater #8, constructed in 2001, with a maximum heat input capacity of four hundred ninety-five thousandths (0.495) million British thermal units (MMBtu) per hour, uncontrolled and exhausting inside the building;

- (2) Aerosol spray paint operation, using hand-held aerosol cans for touch-up purposes and marking steel for ASME code purposes, with VOC emissions less than fifteen (15) pounds per day, are uncontrolled, and are conducted both inside and outside the building;
- (3) One (1), five (5)-gallon paint pot, constructed in 2002, for coating metal tanks, equipped with one (1) hand-held paint gun and one (1) hand-held wand with a 360° circular tip for applying surface coatings at a maximum primer and finish coat application rate of seventy-eight thousandths (0.078) and seventy-nine thousandths (0.079) gallons per hour, respectively, (less than five (5.0) gallons of coating per day), uncontrolled and exhausting inside the building.

Note: The five (5)-gallon Paint Pot is a self contained, transportable, standalone, pressurized container that provides a constant flow of coatings, under constant pressure, to a spray gun. This unit is used whenever there is a need to coat a small number of tanks with a different coating than is being applied in the booths. Using the unit saves time and materials, since it replaces the need to change the coating currently being applied. It is used to paint tanks inside of the paint booths only, and is used to apply the same coatings normally used in the booths.

- (4) Degreasing operations performed using an aqueous-based phosphate cleaner, consisting of one (1) aqueous parts washer, identified as NW1 and exhausting to four (4) stacks, identified as NW-01 through NW-04;
- (5) One (1) multi-gas laser trimmer, with a maximum cutting capacity of thirteen (13) pounds of steel per hour, controlled by a baghouse with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and an air flow rate less than four thousand (4000) cubic feet per minute (cfm).

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the multi-gas laser trimmer is considered an affected facility.

- (6) One (1) plate burner with PM10 emissions less than twenty-five (25) pounds per day, [326 IAC 6-3-1(b)(14)]

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the plate burner is considered an affected facility.

- (7) Metal machining where an aqueous cutting coolant continuously floods the machining interface;
- (8) The following equipment related to manufacturing activities resulting in the emission of HAPs below insignificant emission levels: brazing equipment, cutting torches, soldering equipment, and welding equipment;

- (A) Welding operations with PM10 emission less than twenty-five (25) pounds per day, [326 IAC 6-3-1(b)(14)]

Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the welding operations are considered an affected facility.

- (9) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (10) Combustion source flame safety purging on startup;
- (11) Process vessel degassing and cleaning to prepare internal repairs;
- (12) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;
- (13) One (1) fork lift operation utilizing multiple forklifts with PM10 emissions less than twenty-five (25) pounds per day; [326 IAC 6-3-1(b)(14)] and
- (14) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4];

The following is a list of insignificant activities added since First Administrative Amendment No.: 093-25553-00010, issued on January 2, 2008:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
  - (1) One (1) natural gas-fired comfort heater, identified as Comfort Heater #9, constructed in 2010, with a maximum heat input capacity of forty thousandths (0.040) million British thermal units (MMBtu) per hour, uncontrolled and exhausting inside the building;
  - (2) One (1) natural gas-fired comfort heater, identified as Comfort Heater #10, constructed in 2010, with a maximum heat input capacity of one hundred thousandths (0.100) million British thermal units (MMBtu) per hour, uncontrolled and exhausting inside the building;
- (b) One (1) Whitney plasma cutting machine with PM10 emissions less than twenty-five (25) pounds per day, [326 IAC 6-3-1(b)(14)]  
  
Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the Whitney cutting machine is considered an affected facility.
- (c) Four (4) plasma/oxy-fuel head burners, each with PM10 emissions less than twenty-five (25) pounds per day, [326 IAC 6-3-1(b)(14)]  
  
Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the three (3) plasma/oxy-fuel head burners are each considered an affected facility.
- (d) Handheld plasma/oxy-fuel torches, each with PM10 emissions less than twenty-five (25) pounds per day, [326 IAC 6-3-1(b)(14)]  
  
Under 40 CFR 63, Subpart XXXXXX: National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Metal Fabrication and Finishing Source Categories, the handheld plasma/oxy-fuel torches are each considered an affected facility.

The following is a list of the new emission units and pollution control devices:

- (a) Powder Coating Operations, including the following:

- (1) One (1) Continuous Powder Coating System, identified as the Mainlines Powder Coat System, for applying coatings to metal pressure vessels (aka tanks), consisting of one (1) electrostatic powder paint booth, identified as PB1, approved for construction in 2011, equipped with two (2) electrostatic hand-held spray applicators, with a maximum throughput capacity of forty-five (45) tanks per hour and a maximum material usage of two and sixty-three hundredths (2.63) pounds of powder paint per tank, using fabric filters to control particulate emissions, and exhausting to two (2) stacks PB1-S1 and PB1-S2.
- (2) One (1) Batch Powder Coating System, identified as the Big Tank Lines Powder Coat System, for applying coatings to metal pressure vessels (aka tanks), including one (1) batch down draft electrostatic powder paint booth, identified as PB2, approved for construction in 2011, equipped with one (1) electrostatic hand-held spray applicator, with a maximum throughput capacity of one and thirty-three hundredths (1.33) tanks per hour and a maximum material usage of eight and ninety hundredths (8.90) pounds of powder paint per tank, using fabric filters to control particulate emissions, and exhausting to stacks PB2-S1 and PB2-S2.

The following is a list of new insignificant activities:

- (1) One (1), five (5) stage washer, serving the Mainlines Powder Coat System, approved for construction in 2011, equipped with two (2) natural gas-fired burners, identified as WS-1 and WS-3, with a maximum heat input capacity of one and thirty-five hundredths (1.35) MMBtu/hr, each, uncontrolled, and exhausting to stacks WS-S1, WH-S1, WS-S3 and WH-S3, respectively. [326 IAC 6-2]

*Note: this unit employs indirect heat transfer and qualifies as a boiler under 326 IAC 6-2.*

- (2) One (1) steam jenny washer, serving the Big Tank Lines Powder Coat System, approved for construction in 2011, equipped with one (1) natural gas-fired burner, identified as SJ1, with a maximum heat input capacity of thirty-six hundredths (0.36) MMBtu/hr, uncontrolled, and exhausting to stack SJ-S1; [326 IAC 6-2]

*Note: this unit employs indirect heat transfer and qualifies as a boiler under 326 IAC 6-2.*

- (3) One (1) dry-off oven, serving the Mainlines Powder Coat System, approved for construction in 2011, equipped with one (1) natural gas-fired burner, identified as COB-1, with a maximum heat input capacity of one and twelve hundredths (1.12) MMBtu/hr, uncontrolled, and exhausting to stack CO-S1
- (4) One (1) cure oven, serving the Mainlines Powder Coat System, approved for construction in 2011, equipped with two (2) natural gas-fired burners, identified as CO-1 and CO-2, with maximum heat input capacities of one and thirty-eight hundredths (1.38) and two (2.00) MMBtu/hr, respectively, uncontrolled, and exhausting to stack CO-S1.
- (5) One (1) batch cure oven, serving the Big Tank Lines Powder Coat System, approved for construction in 2011, equipped with one (1) natural gas-fired burner, identified as BO1, with a maximum heat input capacity of one and twenty hundredths (1.20) MMBtu/hr, uncontrolled, and exhausting to stack BO-S1

#### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted emission units operating at this source during this review process.

The source has been operating under Part 70 Operating Permit Renewal No. T093-20665-00010, issued on July 24, 2006. On October 21, 2010, the source submitted an application related to the

transition of a Part 70 Operating Permit to a Federally Enforceable State Operating Permit (FESOP). The above-listed insignificant activities, added since Administrative Amendment No.: 093-25553-00010, issued on January 2, 2008, including the one (1) forty thousandths (0.040) MMBtu/hr comfort heater, one (1) one hundred thousandths (0.100) MMBtu/hr comfort heater, one (1) Whitney Plasma Machine, three (3) plasma/oxy fuel head burners, and fifteen (15) handheld plasma/oxy fuel torches, are of the same type and will comply with the same applicable requirements and permit terms and conditions as the existing comfort heaters, cutting machine, and burners. The potential emissions of regulated criteria pollutants and hazardous air pollutants from each of the new units are less than the ranges specified 326 IAC 2-7-1(21)(E), (F), & (G), and 326 IAC 2-1.1-3(e)(1), respectively. The addition of these units do not cause the source's potential to emit to be greater than the threshold levels specified in 326 IAC 2-2 or 326 IAC 2-3. Therefore, the addition of these units to the permit would have been considered an administrative amendment pursuant to 326 IAC 2-7-11(a)(8).

#### **Emission Units and Pollution Control Equipment Removed From the Source**

The source has removed the following emission units:

- (a) One (1) water heater, identified as Water Heater #3, constructed in 1987, with a maximum heat input capacity of forty thousandths (0.040) million British thermal units (MMBtu) per hour, uncontrolled and exhausting inside the building;
- (b) One (1) mixing unit consisting of four (4) 5 gallon containers which emit less than fifteen 15 pounds of VOC per day;
- (c) One (1) furnace, rated at 65 thousand Btu per hour,
- (d) One (1) furnace, rated at 80 thousand Btu per hour,
- (e) One (1) furnace, rated at 85 thousand Btu per hour,
- (f) One (1) hole burner with PM10 emissions less than twenty-five (25) pounds per day,

#### **"Integral Part of the Process" Determination**

The Permittee has submitted the following information to justify why the dust collector, equipped with dry filters, should be considered an integral part of the pneumatic blasting operation (SB1):

- (a) The shotblast unit cannot operate without the control device because the control device exhaust fan is what maintains a steady air flow across the shot curtain in the separator to "sift" out lighter and undersized particles such as detached mil scale, dust, and broken down abrasive. If the shotblast equipment was not equipped with this control device, useless dust, fines, and other contaminants would be re-introduced back into the system which would prevent the parts from being cleaned to the quality standard needed to apply coatings.
- (b) The dust collector exhauster provides a negative pressure in the blast cabinet. By creating this negative pressure, air outside the cabinet is drawn into the cabinet rather than air and dust inside the cabinet being forced out of the cabinet, causing the system to not operate properly. In addition, the dust collector removes floating dust within the blasting chamber, which if not removed would impair the vision of the operator to see the parts to be cleaned.
- (c) While the primary purpose of the dust collector is not to serve as a pollution control devices, the useless fines and contaminants that are separated from the re-usable abrasive are captured by it, therefore reducing emissions by 99.98%.
- (d) In addition to the control device being integral to the process from an operational stance, there is a significant cost savings in having the ability to reuse the shotblast material vs.

spraying to waste. In 2010, the unit was actually operated for 369 hours and 2,400 lbs. of blast media was used/replaced. In looking at the abrasive flow rate (1265 lbs of blast media/hr), outlined in the Technical Support Document for Title V No: T093-20665-00010, if the dust collector were not used to recycle the shotblast media, 466,785 pounds of media would be sprayed to waste and need to be replaced. At the current rate of \$0.45 per pound, that is a cost savings of \$208,973.24 a year which makes not operating the control device cost prohibitive. Finally, the maintenance cost for the machine is minimal; the requirement to change out the filters is determined by the pressure readings on the manometer and varies depending on the usage of the machine (369 hours in 2010). Because there is low usage of the machine, the filters do not require changing out often (at most once per year) and the time it takes to change them is minimal.

IDEM, OAQ has evaluated the information submitted and has determined that the dust collector, equipped with dry filters, is not considered an integral part of the pneumatic blasting operation (SB1), for the following reasons: (1) the negative pressure differential in the blast cabinet does not ensure that the PM and PM10 emissions are controlled (i.e., a pressure differential on its own is not a control device); (2) The justification centers primarily on maintaining the efficiency of the process and producing less defective products if the dust collector is operating; however, this does not necessarily mean that the process cannot operate without the dust collector. The shot blaster can operate without the dust collector until the concentration of fines becomes too high; and (3) the source has not provided adequate data to support its claim that the collection and recycling of the shotblast media has an overwhelming positive net economic effect for the company. Therefore, the permitting level will be determined using the potential to emit before the dust collector, equipped with dry filters. This determination was similar to determinations made under the following permit reviews: Part 70 Operating Permit Renewal No. T079-29942-00018, issued on April 4, 2011, Registration No. R001-26137-00064, issued on June 5, 2008, and MSOP No. M005 - 23566 - 00092, issued on April 11, 2008.

**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	308.25
PM10 <sup>(1)</sup>	293.53
PM2.5	293.53
SO2	0.06
NOx	9.55
VOC	16.90
CO	8.02
GHGs as CO <sub>2</sub> e	11,530.46

(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".

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of PM10 and PM2.5 are each 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)) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) per year.

HAPs	Potential To Emit (tons/year)
2-Propoxyethanol	1.54
Chromium	0.91
Manganese	0.80
Selenium	0.71
Xylenes	0.61
Toluene	0.49
Nickel	0.45

HAPs	Potential To Emit (tons/year)
Lead	0.31
Hexane	0.17
Di-N-Butyl Phthalate	0.10
Glycol Ether EP	0.05
Triethylamine	0.04
Arsenic	0.01
All Other HAPs	0.01
<b>TOTAL HAPs</b>	<b>6.20</b>

- (c) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**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.

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Process/ Emission Unit	Potential To Emit of the Entire Source after Issuance of FESOP (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
<b>Surface Coating</b>										
Spray Coating (Units #7 & PP1)	21.55	21.55	21.55	0	0	13.67	0	0	1.37	1.22 (2-Propoxyethanol)
Paint Pot & Aerosol Coating	1.77	1.77	1.77	0	0	2.71	0	0	1.47	0.55 (xylenes)
Powder Coating Operation (PB1) <sup>(1)</sup>	12.97	6.48	6.48	0	0	0	0	0	0	NA
Powder Coating Operation (PB2) (1)	1.30	0.65	0.65	0	0	0	0	0	0	NA
Blasting Operation (SB1) <sup>(1)</sup>	5.45	4.69	4.69	0	0	0	0	0	0	NA
Plasma Machine	21.99	21.99	21.99	0	0	0	0	0	1.41	0.31 (selenium)
Cutting Operations	10.17	10.17	10.17	0	0	0	0	0	1.23	0.65 (chromium)
Welding	0.90	0.90	0.90	0	0	0	0	0	0.543	0.538 (Manganese)
Natural Gas Combustion	0.18	0.73	0.73	0.06	9.55	0.53	8.03	11,530.46	0.18	0.17 (Hexane)
<b>Total PTE of Entire Source</b>	<b>76.29</b>	<b>68.94</b>	<b>68.94</b>	<b>0.06</b>	<b>9.55</b>	<b>16.90</b>	<b>8.02</b>	<b>11,530.46</b>	<b>6.20</b>	<b>1.54 (2-Propoxyethanol)</b>
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	10	10
PSD Major Source Thresholds**	250	250	250	250	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
negl. = negligible      NA = not applicable										
* 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".										
** The 100,000 CO <sub>2</sub> e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										
(1) Limited PTE based upon a pound per hour emission limitation to comply with 326 IAC 2-8 (FESOP). See below and Appendix A, for more details. The remaining emissions represent unlimited and uncontrolled PTE.										

(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 existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is 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) PM10 emissions from electrostatic powder paint booth PB1 shall not exceed one and forty-eight hundredths (1.48) pounds of PM10 per hour;
- (2) PM2.5 emissions from electrostatic powder paint booth PB1 shall not exceed one and forty-eight hundredths (1.48) pounds of PM2.5 per hour;
- (3) PM10 emissions from electrostatic powder paint booth PB2 shall not exceed fifteen hundredths (0.15) pounds of PM10 per hour;

- (4) PM2.5 emissions from electrostatic powder paint booth PB2 shall not exceed fifteen hundredths (0.15) pounds of PM2.5 per hour;
- (5) PM10 emissions from the pneumatic blasting operation (SB1) shall not exceed one and seven hundredths (1.07) pounds of PM10 per hour; and
- (6) PM2.5 emissions from the pneumatic blasting operation (SB1) shall not exceed one and seven hundredths (1.07) pounds of PM2.5 per hour.

Compliance with these limits, combined with the potential to emit PM10 and PM2.5 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 one hundred (100) tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits) not applicable.

Note: the source can comply with each of the above-listed limits using a control device having a minimum control efficiency of 95%, as demonstrated in TSD Appendix A.

(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 two hundred fifty (250) tons per year, the potential to emit all other attainment regulated pollutants are less than two hundred fifty (250) tons per year, the potential to emit greenhouse gases (GHGs) is less than the PSD subject to regulation threshold of one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent emissions (CO<sub>2</sub>e) 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:

- (1) PM emissions from electrostatic powder paint booth PB1 shall not exceed two and ninety-six hundredths (2.96) pounds of PM per hour;  
Note: the source can comply with the above-listed limit using a control device having a minimum control efficiency of 90%, as demonstrated in TSD Appendix A.
- (2) PM emissions from electrostatic powder paint booth PB2 shall not exceed thirty hundredths (0.30) pounds of PM per hour; and  
Note: the source can comply with the above-listed limit using a control device having a minimum control efficiency of 90%, as demonstrated in TSD Appendix A.
- (3) PM emissions from the pneumatic blasting operation (SB1) shall not exceed one and twenty-four hundredths (1.24) pounds of PM per hour.  
Note: the source can comply with the above-listed limit using a control device having a minimum control efficiency of 95%, as demonstrated in TSD Appendix A.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than two hundred fifty (250) tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

### Federal Rule Applicability Determination

#### *New Source Performance Standards (NSPS)*

(a) 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

- (1) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit for the two (2) existing one and five tenths (1.5) MMBtu water heaters, identified as Water Heater #1 and Water Heater #2, and the one (1) existing forty thousandths (0.040) MMBtu water heater, identified as Water Heater #3, each, because although they combust fuel to heat water, their maximum design heat input capacities are less than the applicability threshold of ten (10) million British thermal units per hour.
- (2) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit for the one (1) existing natural gas-fired bake oven, identified as Bk01, one (1) existing natural gas-fired dry-off oven, identified as NDO1, and the ten (10) existing natural gas-fired comfort heaters, identified as Comfort Heater #1 - #10, each, because they do not combust fuel to produce steam or heat water or any transfer medium, and therefore do not meet the definition of a steam generating unit, as defined in 40 CFR 60.41c (Definitions).
- (3) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit for the two (2) new one and thirty-five hundredths (1.35) MMBtu/hr natural gas-fired burners in the five (5) stage washer, identified as WS-1 and WS-3, and the one (1) new thirty-six hundredths (0.36) MMBtu/hr/hr natural gas-fired burner in the steam jenny washer, identified as SJ1, each, because although they combust fuel to heat water, their maximum design heat input capacities are less than the applicability threshold of ten (10) million British thermal units per hour.
- (4) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit for the one (1) new natural gas-fired burner in the mainlines dry-off oven, identified as COB-1, two (2) new natural gas-fired burners in the mainlines cure oven, identified as CO-1 and CO-2, and the one (1) new natural gas-fired burner in the big tank lines batch cure oven, identified as BO1, each, because they do not combust fuel to produce steam or heat water or any transfer medium, and therefore do not meet the definition of a steam generating unit, as defined in 40 CFR 60.41c (Definitions).

(b) 40 CFR 60, Subpart E - Standards of Performance for Incinerators

- (1) The requirements of the New Source Performance Standard for Incinerators, 40 CFR 60, Subpart E (326 IAC 12), are not included in this renewal, because the three (3) existing water heaters, identified as Water Heater #1 through Water Heater #3, one (1) existing natural gas-fired bake oven, identified as Bk01, one (1) existing natural gas-fired dry-off oven, identified as NDO1, and the ten (10) existing natural gas-fired comfort heaters, identified as Comfort Heater #1 - #10, are each not an incinerator, as defined by 40 CFR 60.51(b), since they do not burn waste substances.
- (2) The requirements of the New Source Performance Standard for Incinerators, 40 CFR 60, Subpart E (326 IAC 12), are not included in this renewal, because the two (2) new natural gas-fired burners in the five (5) stage washer, identified as WS-1 and WS-3, one (1) new natural gas-fired burner in the steam jenny washer, identified as SJ1, one (1) new natural gas-fired burner in the mainlines dry-off oven, identified as COB-1, two (2) new natural gas-fired burners in the mainlines cure oven, identified as CO-1 and CO-2, and the one (1) new

natural gas-fired burner in the big tank lines batch cure oven, identified as BO1, each, are each not an incinerator, as defined by 40 CFR 60.51(b), since they do not burn waste substances.

- (c) 40 CFR 60, Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Is Commenced After November 30, 1999 or for Which Modification or Reconstruction Is Commenced on or After June 1, 2001
- (1) The requirements of the New Source Performance Standard for Commercial and Industrial Solid Waste Incineration Units for Which Construction Is Commenced After November 30, 1999 or for Which Modification or Reconstruction Is Commenced on or After June 1, 2001, 40 CFR 60, Subpart CCCC (4C) (326 IAC 12), are not included in the permit, for the three (3) existing natural gas-fired water heaters, identified as Water Heater #1 through Water Heater #3, one (1) existing natural gas-fired bake oven, identified as Bk01, one (1) existing natural gas-fired dry-off oven, identified as NDO1, and the ten (10) existing natural gas-fired comfort heaters, identified as Comfort Heater #1 - #10, do not burn any solid waste, as defined by 40 CFR 60.2265.
- (2) The requirements of the New Source Performance Standard for Commercial and Industrial Solid Waste Incineration Units for Which Construction Is Commenced After November 30, 1999 or for Which Modification or Reconstruction Is Commenced on or After June 1, 2001, 40 CFR 60, Subpart CCCC (4C) (326 IAC 12), are not included in the permit, since the two (2) new natural gas-fired burners in the five (5) stage washer, identified as WS-1 and WS-3, one (1) new natural gas-fired burner in the steam jenny washer, identified as SJ1, one (1) new natural gas-fired burner in the mainlines dry-off oven, identified as COB-1, two (2) new natural gas-fired burners in the mainlines cure oven, identified as CO-1 and CO-2, and the one (1) new natural gas-fired burner in the big tank lines batch cure oven, identified as BO1, each, do not burn any solid waste, as defined by 40 CFR 60.2265.
- (d) There are no New Source Performance Standards (NSPS) (40 CFR Part 60 and 326 IAC 12) included in the permit, for this existing source.

*National Emission Standards for Hazardous Air Pollutants (NESHAP)*

- (a) 40 CFR 63 Subpart T - NESHAP for Halogenated Solvent Cleaning  
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning, 40 CFR 63, Subpart T (326 IAC 20-6), are not included in the permit, because this existing source does not use a degreasing solvent that contains any of the halogenated compounds listed in 40 CFR 63.460(a).
- (b) 40 CFR 63 Subpart MMMM - NESHAPs for Miscellaneous Metal Parts and Products Surface Coating  
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM (4M) (326 IAC 20-80), are not included in the permit because although coatings containing hazardous air pollutants (HAP) are applied to miscellaneous metal parts and products, as defined in 40 CFR 63.3881 (a), this existing metal pressure vessels manufacturing plant is not a major source of HAPs. The potential of emit of any single HAP is less than ten (10) tons per year and any combination of HAPs is less than twenty-five (25) tons per year.
- (c) 40 CFR 63, Subpart DDDDD - NESHAPs for Industrial, Commercial, and Institutional Boilers, and Process Heaters  
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (5D) (326 IAC 20), are not included in the permit, as follows:

On June 8, 2007, the United States Court of Appeals for the District of Columbia Circuit (in *National Resource Defense Council, Sierra Club, Environmental Integrity Project vs. EPA*, No. 04-1385),

vacated 40 CFR 63, Subpart DDDDD in its entirety. Additionally, since State Rule 326 IAC 20-95 incorporated the requirements of the NESHAP 40 CFR 63, Subpart DDDDD by reference, the requirements of 326 IAC 20-95 are no longer effective. However, since NESHAP 40 CFR Part 63, Subpart DDDDD has been vacated, Section 112(j) of the Clean Air Act, major sources of Hazardous Air Pollutants (HAPs), in specified source categories, requires a case-by-case MACT determination when EPA fails to promulgate a scheduled MACT Standard by the regulatory deadline. Manchester Tank and Equipment Company is still considered an area source under Section 112 of the Clean Air Act, MACT Standards. Therefore, the source is not subject to a case-by-case MACT determination.

(d) 40 CFR 63, Subpart HHHHHH - NESHAP Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH (6H) (326 IAC 20), are not included in the permit, because although this existing source meets the definition of an area source, as defined in 40 CFR 63.2, and uses spray application methods to coat metal pressure vessels, the coatings used do not contain compounds of cadmium (Cd), chromium (Cr), lead (Pb), manganese (Mn), or nickel (Ni). Additionally, this source does not perform paint stripping using Methylene Chloride (MeCl), and does not conduct any autobody refinishing operations.

(e) 40 CFR 63, Subpart JJJJJJ - NESHAPs for Industrial, Commercial, and Institutional Boilers Area Sources

(1) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (6J), are not included in the permit for three (3) existing natural gas-fired water heaters, identified as Water Heater #1 through Water Heater #3, because gas-fired boilers and hot water heaters, as define in 40 CFR 63.11237, are specifically exempted from this rule as indicated in 40 CFR 63.11195(e).

(2) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (6J), are not included in the permit for the one (1) existing natural gas-fired bake oven, identified as Bk01, one (1) existing natural gas-fired dry-off oven, identified as NDO1, and the ten (10) existing natural gas-fired comfort heaters, identified as Comfort Heater #1 - #10, because each unit is a direct-fired process heater and does not meet the definition of a boiler, as defined in 40 CFR 63.11237.

(3) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (6J), are not included in the permit for two (2) new natural gas-fired burners in the five (5) stage washer, identified as WS-1 and WS-3, one (1) new natural gas-fired burner in the steam jenny washer, identified as SJ1, because gas-fired boilers and hot water heaters, as define in 40 CFR 63.11237, are specifically exempted from this rule as indicated in 40 CFR 63.11195(e).

(4) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ (6J), are not included in the permit for the one (1) new natural gas-fired burner in the mainlines dry-off oven, identified as COB-1, two (2) new natural gas-fired burners in the mainlines cure oven, identified as CO-1 and CO-2, and the one (1) new natural gas-fired burner in the big tank lines batch cure oven, identified as BO1, because each unit is a direct-fired process heater and does not meet the definition of a boiler, as defined in 40 CFR 63.11237.

(f) 40 CFR 63, Subpart XXXXXX - NESHAPs for Nine Metal Fabrication and Finishing Source Categories

This existing stationary metal pressure vessels manufacturing plant is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Nine Metal Fabrication and Finishing Source Categories, 40 CFR 63, Subpart XXXXXX (6X) (326 IAC 20), since the source is primarily engaged in fabricated plate work, listed as one of the nine metal fabrication and finishing source categories, defined in 40 CFR 63.11514 and 40 CFR 63.11522, and because the pneumatic blasting, welding, and metal machining, cutting, and burning operations, each, use, and/or affect materials, which contain or have the potential to emit metal fabrication or finishing metal HAPs (MFHAPs), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead, in 40 CFR 63.11522, in concentrations above the thresholds specified in 40 CFR 63.11514(b).

Therefore, the pneumatic blasting, welding, and metal machining, cutting, and burning operations are subject to the following portions of Subpart 6X:

- |                                 |               |
|---------------------------------|---------------|
| (A) 63.11514;                   | (E) 63.11519; |
| (B) 63.11515;                   | (F) 63.11521; |
| (C) 63.11516(a), (b), (c), (f); | (G) 63.11522; |
| (D) 63.11517                    | (H) 63.11523; |

*Note: There are no testing requirements applicable to this source for this NESHAP. However, there are applicable monitoring requirements, including visual determinations of fugitive emissions and opacity.*

The requirements of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to each of the facilities described in this section except when otherwise specified in 40 CFR 63, Subpart XXXXXX.

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

*Compliance Assurance Monitoring (CAM)*

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

<b>State Rule Applicability - Entire Source</b>
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(a) 326 IAC 1-6-3 (Preventive Maintenance Plan)

The source continues to be subject to 326 IAC 1-6-3.

(b) 326 IAC 2-1.1-5 (Nonattainment New Source Review)

Lawrence County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Additionally, 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 two and five tenths (2.5) micrometers (PM<sub>2.5</sub>), is limited to less than one hundred (100) tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply, and are not included in the permit. See the "PTE of the Entire Source after Issuance of the FESOP" section above for more details.

(c) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))

PSD applicability is discussed under the PTE of the Entire Source after Issuance of the FESOP section above.

- (d) 326 IAC 2-3 (Emission Offset)  
Lawrence County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Additionally, this existing source is not considered a major source because the potential emissions for all criteria pollutants are limited to less than the Title V Thresholds. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) do not apply, and are not included in the permit.
- (e) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The unlimited potential to emit HAPs from the entire source is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 do not apply, and are not included in the permit.
- (f) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is no longer subject to this rule, because it has elected to limit emissions under the FESOP program and consequently 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 five (5) tons per year. Therefore, pursuant to 326 IAC 2-6-1(b), the source is only subject to additional information requests as provided in 326 IAC 2-6-5.
- (g) 326 IAC 2-8-4 (FESOP)  
FESOP applicability is discussed under the PTE of the Entire Source after Issuance of the FESOP section above.
- (h) 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 continue to meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (i) 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.
- (j) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (k) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

<b>State Rule Applicability – Individual Facilities</b>
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*Surface Coating Operations*

- (a) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)  
(1) The two (2) paint spray booths (#7 and PP1) will use more than five (5) gallons of coatings per day. Therefore, pursuant to 326 IAC 6-3-2(d) (Particulate emission limitations, work practices, and control technologies), particulate from the two (2) paint spray booths (#7 and PP1) shall be controlled by a dry particulate filter, waterwash, or an equivalent control device

and the Permittee shall operate the control device in accordance with manufacturer's specifications.

- (2) The Paint Pot System applies less than five (5) gallons of coating per day. Therefore, the requirements of 326 IAC 6-3-2 do not apply and are not included in the permit.
- (3) Applications of aerosol coating products to repair minor surface damage and imperfections are specifically exempted from the requirements of 326 IAC 6-3-2, under 326 IAC 6-3-1(b)(12). Additionally, the use of aerosol spray paint to mark steel for ASME code purposes, does not meet the definition of a manufacturing process, as defined under 326 IAC 6-3-1.5(2). The aerosol spray paint operation, uses hand-held aerosol cans for touch-up purposes and to mark steel for ASME code purposes only; therefore, the requirements of 326 IAC 6-3-2 do not apply, and are not included in the permit.
- (4) Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the each of the processes listed in the table below shall not exceed the corresponding pound per hour limitations, as follows:

Emission Unit	Process Weight Rate		Allowable Emission Rate (lb/hour)
	(lbs/hr)	(tons/hr)	
electrostatic powder paint booth PB1 (per each spray gun)	9,753	4.88	11.85
electrostatic powder paint booth PB2	19,509	9.75	18.86

These limitations were calculated as follows:

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

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

- (1) Based on the calculations provided in Appendix A, the potential uncontrolled PM emission rate from each of the spray guns in electrostatic powder paint booth PB1 is fourteen and eighty hundredths (14.80) pounds per hour, which is greater than the allowable rate of eleven and eighty-five hundredths (11.85) pounds of PM per hour. Therefore, the dry filters, for particulate control, shall be in operation and control emissions at all times that electrostatic powder paint booth PB1 is in operation, in order to comply with the limits.
- (2) Based on the calculations provided in Appendix A, the potential uncontrolled PM emission rate from the spray gun in electrostatic powder paint booth PB2 is two and ninety-six hundredths (2.96) pounds per hour, which is less than the allowable rate of eighteen and eighty-six hundredths (18.86) pounds of PM per hour.

Therefore, based on calculations, the dry filters, for particulate control, are not needed to comply with this limit.

(b) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

- (1) The two (2) paint spray booths (#7 and PP1) are subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations). Therefore, the requirements of 326 IAC 8-1-6 do not apply, and are not included in the permit.

- (2) The Paint Pot is subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations). Therefore, the requirements of 326 IAC 8-1-6 do not apply, and are not included in the permit.
  - (3) The aerosol spray paint touch-up operation is subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations). Therefore, the requirements of 326 IAC 8-1-6 do not apply, and are not included in the permit.
  - (4) The Continuous Powder Coating System, consisting of electrostatic powder paint booth PB1, and the Batch Powder Coating System, consisting of electrostatic powder paint booth PB2, are each subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations). Therefore, the requirements of 326 IAC 8-1-6 do not apply, and are not included in the permit.
- (c) 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations)
- (1) The two (2) existing paint spray booths (#7 and PP1), each constructed in 1987, after the rule applicability date of July 1, 1980, continue to apply coatings to metal pressure vessels, under Standard Industrial Classification (SIC) Code major group #34. Although, the potential VOC emissions are now less than twenty-five (25) tons per year, combined, once a facility becomes subject to an article 8 rule, the facility remains subject to the rule notwithstanding any subsequent decrease in VOC emissions. Therefore, the requirements of 326 IAC 8-2-9, continue to apply to two (2) existing paint spray booths, and are included in the permit, as follows:
    - (A) Pursuant to 326 IAC 8-2-9, the volatile organic compound (VOC) content of the coatings, as delivered to the applicator(s) of the two (2) spray booths (identified as PP1 and #7), shall not exceed three and five tenths (3.5) pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Based on the MSDS submitted by the source and calculations made, paint spray booths PP1 and #7 are each in compliance with this requirement.
    - (B) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:
      - (i) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
      - (ii) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
      - (iii) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
      - (iv) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
      - (v) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

- (2) The potential and actual VOC emissions from the Paint Pot are still less than fifteen (15) lbs/day, therefore, the requirements of 326 IAC 8-2-9 do not apply and are not included in the permit.
- (3) The potential and actual VOC emissions from the aerosol spray paint operation, using hand-held aerosol cans for touch-up purposes and marking steel for ASME code purposes, are less than fifteen (15) lbs/day; therefore, the requirements of 326 IAC 8-2-9 do not apply and are not included in the permit.
- (4) The potential and actual VOC emissions from Continuous Powder Coating System, consisting of electrostatic powder paint booth PB1, and the Batch Powder Coating System, consisting of electrostatic powder paint booth PB2, combined, are less than fifteen (15) lbs/day; therefore, the requirements of 326 IAC 8-2-9 do not apply and are not included in the permit.

See Appendix A, for the detailed calculations.

- (d) 326 IAC 8-3 (Organic Solvent Degreasing Operations)  
The solvent clean-up activities occurring in the surface coating operations are not of a type as described in subdivisions 326 IAC 8-3-1(b)(1)(A) through 326 IAC 8-3-1(b)(1)(C). Therefore, the requirements of 326 IAC 8-3 do not apply to any of the Surface Coating Operations, and are not included in the permit.
- (e) There are no other 326 IAC 8 Rules applicable to the Surface Coating Operations.

#### *Degreasing Operations*

- (a) 326 IAC 8-3 (Organic Solvent Degreasing Operations)  
The degreasing operations, consisting of one (1) aqueous parts washer, identified as NW1, are performed using an aqueous-based phosphate cleaner, not a solvent containing VOCs, as defined in 326 IAC 1-2-90. Therefore, the requirements of 326 IAC 8-3 do not apply, and are not included in the permit.
- (b) There are no other 326 IAC 8 Rules applicable to the Degreasing Operations.

#### *Pneumatic Blasting, Metal Cutting, Machining, & Welding Operations*

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
  - (1) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the pneumatic blasting operation, identified as SB1, shall not exceed twenty-two and seventy hundredths (22.70) pounds per hour when operating at a process weight rate of twelve and eighty-six hundredths (12.86) tons per hour (or 25,723 lbs/hr). The pound per hour limitation was calculated as follows: Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

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

Based on the calculations provided in Appendix A, the potential uncontrolled PM emission rate from the pneumatic blasting operation (SB1) is twenty-four and eighty-nine hundredths (24.89) pounds per hour, which is greater than the allowable rate of twenty-two and seventy hundredths (22.70) pounds of PM per hour.

Therefore, the dust collector, equipped with dry filters, for particulate control shall be in operation at all times that the pneumatic blasting operation (SB1) is in operation, in order to comply with this limit.

- (2) Pursuant to 326 IAC 6-3-1(b)(10), the metal oxyfuel/plasma cutting machine is exempt from particulate emission limitations for manufacturing processes because less than three thousand four hundred (3,400) inches per hour of stock, one (1) inch thick or less, is cut.
- (3) The potential to emit particulate matter (PM) from the multi-gas laser trimmer, Whitney plasma cutting machine, plate burner, hole burner, metal machining, three (3) plasma/oxy-fuel head burners, handheld plasma/oxy-fuel torches, and welding operations are each less than five hundred and fifty-one thousandths (0.551) pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), these units are exempt from particulate emission limitations for manufacturing processes.

See Appendix A, for the detailed calculations.

#### *Natural Gas Combustion Units*

(a) 326 IAC 4-2-2 (Incinerators)

- (1) The two (2) existing water heaters, identified as Water Heater #1 and Water Heater #2, one (1) existing water heater, identified as Water Heater #3, one (1) existing natural gas-fired bake oven, identified as Bk01, one (1) existing natural gas-fired dry-off oven, identified as NDO1, and the ten (10) existing natural gas-fired comfort heaters, identified as Comfort Heater #1 - #10, are each not an incinerator, as defined by 326 IAC 1-2-34, since they do not burn waste substances. Therefore, the requirements of 326 IAC 4-2-2 (Incinerators) do not apply, and are not included in the permit.
- (2) The two (2) new natural gas-fired burners in the five (5) stage washer, identified as WS-1 and WS-3, one (1) new natural gas-fired burner in the steam jenny washer, identified as SJ1, one (1) new natural gas-fired burner in the mainlines dry-off oven, identified as COB-1, two (2) new natural gas-fired burners in the mainlines cure oven, identified as CO-1 and CO-2, and the one (1) new natural gas-fired burner in the big tank lines batch cure oven, identified as BO1, are each not an incinerator, as defined by 326 IAC 1-2-34, since they do not burn waste substances. Therefore, the requirements of 326 IAC 4-2-2 (Incinerators) do not apply, and are not included in the permit.

(b) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)

- (1) The two (2) existing one and five tenths (1.5) MMBtu water heaters, identified as Water Heater #1 and Water Heater #2, and the one (1) existing forty thousandths (0.040) MMBtu water heater, identified as Water Heater #3, each constructed in 1987, after the rule applicability date of September 21, 1983, must comply with the requirements of 326 IAC 6-2-4, as follows:

The emission limitation for these units, as provided in 326 IAC 6-2-4, is based on the following equation:

$$Pt = \frac{1.09}{Q_T^{0.26}}$$

Where:

Pt = Emission rate limit (lbs PM per MMBtu)

Q<sub>T</sub> = Total source heat input capacity rating in million Btu per hour (Q<sub>T</sub> = Q<sub>1</sub> + Q<sub>2</sub> ...)

= 3.04 MMBtu per hour

However, according to 326 IAC 6-2-4(a), for Q less than ten (10) MMBtu per hour, Pt shall not exceed six tenths (0.6) lbs PM per MMBtu. Therefore, the two (2) existing water heaters, identified as Water Heater #1 and Water Heater #2, and the one (1) existing water heater,

identified as Water Heater #3, are each limited to six tenths (0.6) lbs of PM per MMBtu heat input.

Based on Appendix A and AP-42, the potential PM emission rate is one and ninety hundredths (1.90) pounds per million cubic feet of natural gas or nineteen ten-thousandths (0.0019) pounds per million British thermal units. Therefore, the two (2) existing water heaters, identified as Water Heater #1 and Water Heater #2, and the one (1) existing water heater, identified as Water Heater #3, each, complies with this rule.

- (2) The one (1) existing natural gas-fired bake oven, identified as Bk01, one (1) existing natural gas-fired dry-off oven, identified as NDO1, and the ten (10) existing natural gas-fired comfort heaters, identified as Comfort Heater #1 - #10, each, still do not meet the definition of an indirect heating unit, as defined in 236 IAC 1-2-19. Therefore, the requirements of 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units) do not apply, and are not included in this permit.
- (3) The two (2) new one and thirty-five hundredths (1.35) MMBtu/hr natural gas-fired burners in the five (5) stage washer, identified as WS-1 and WS-3, and the one (1) new thirty-six hundredths (0.36) MMBtu/hr/hr natural gas-fired burner in the steam jenny washer, identified as SJ1, each approved for construction in 2011, after the rule applicability date of September 21, 1983, must comply with the requirements of 326 IAC 6-2-4, as follows:

The emission limitation for these units, as provided in 326 IAC 6-2-4, is based on the following equation:

$$Pt = \frac{1.09}{Q_T^{0.26}}$$

Where:

Pt = Emission rate limit (lbs PM per MMBtu)  
Q<sub>T</sub> = Total source heat input capacity rating in million Btu per hour (Q<sub>T</sub> = Q<sub>1</sub> + Q<sub>2</sub> ...)  
= 6.10 MMBtu per hour

However, according to 326 IAC 6-2-4(a), for Q less than ten (10) MMBtu per hour, Pt shall not exceed six tenths (0.6) lbs PM per MMBtu. Therefore, the two (2) new natural gas-fired burners in the five (5) stage washer, identified as WS-1 and WS-3, one (1) new natural gas-fired burner in the steam jenny washer, identified as SJ1, are each also limited to six tenths (0.6) lbs of PM per MMBtu heat input.

Based on Appendix A and AP-42, the potential PM emission rate is one and ninety hundredths (1.90) pounds per million cubic feet of natural gas or nineteen ten-thousandths (0.0019) pounds per million British thermal units. Therefore, the two (2) new natural gas-fired burners in the five (5) stage washer, identified as WS-1 and WS-3, one (1) new natural gas-fired burner in the steam jenny washer, identified as SJ1, each, complies with this rule.

- (4) The one (1) new natural gas-fired burner in the mainlines dry-off oven, identified as COB-1, two (2) new natural gas-fired burners in the mainlines cure oven, identified as CO-1 and CO-2, and the one (1) new natural gas-fired burner in the big tank lines batch cure oven, identified as BO1, each, do not meet the definition of an indirect heating unit, as defined in 236 IAC 1-2-19. Therefore, the requirements of 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units) do not apply, and are not included in this permit.
- (c) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
- (1) The two (2) existing water heaters, identified as Water Heater #1 and Water Heater #2, one (1) existing water heater, identified as Water Heater #3, one (1) existing natural gas-fired bake oven, identified as Bk01, one (1) existing natural gas-fired dry-off oven, identified as

NDO1, and the ten (10) existing natural gas-fired comfort heaters, identified as Comfort Heater #1 - #10, each, do not meet the definition of a "manufacturing process", as defined in 326 IAC 6-3-1.5(2). Therefore, each of these units is exempt from 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), and the requirements are not included in this permit.

- (2) The two (2) new natural gas-fired burners in the five (5) stage washer, identified as WS-1 and WS-3, one (1) new natural gas-fired burner in the steam jenny washer, identified as SJ1, one (1) new natural gas-fired burner in the mainlines dry-off oven, identified as COB-1, two (2) new natural gas-fired burners in the mainlines cure oven, identified as CO-1 and CO-2, and the one (1) new natural gas-fired burner in the big tank lines batch cure oven, identified as BO1, each, do not meet the definition of a "manufacturing process", as defined in 326 IAC 6-3-1.5(2). Therefore, each of these units is exempt from 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), and the requirements are not included in this permit.

(d) 326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations)

- (1) The potential SO2 emissions from the two (2) water heaters, identified as Water Heater #1 and Water Heater #2, one (1) water heater, identified as Water Heater #3, one (1) natural gas-fired bake oven, identified as Bk01, one (1) natural gas-fired dry-off oven, identified as NDO1, and the ten (10) natural gas-fired comfort heaters, identified as Comfort Heater #1 - #10, each, are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively. Therefore, the requirements of 326 IAC 7-1.1-2 do not apply, and are not included in this permit.
- (2) The potential SO2 emissions from the two (2) new natural gas-fired burners in the five (5) stage washer, identified as WS-1 and WS-3, one (1) new natural gas-fired burner in the steam jenny washer, identified as SJ1, one (1) new natural gas-fired burner in the mainlines dry-off oven, identified as COB-1, two (2) new natural gas-fired burners in the mainlines cure oven, identified as CO-1 and CO-2, and the one (1) new natural gas-fired burner in the big tank lines batch cure oven, identified as BO1, each, are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively. Therefore, the requirements of 326 IAC 7-1.1-2 do not apply, and are not included in this permit.

**Compliance Determination, Monitoring, Testing, Recordkeeping and Reporting Requirements**

*Compliance Determination*

- (a) The two (2) paint spray booths (#7 and PP1) have applicable compliance determination requirements, as specified below:

Emission Unit/Control	Operating Parameters	Method
Two (2) paint spray booths (#7 and PP1), and the aerosol spray paint touch-up operation	VOC content	Preparing or obtaining the "as supplied" and "as applied" VOC data sheets
		Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

- (1) Confirmation of the VOC content of the coatings used in the two (2) paint spray booths (#7 and PP1) is required to determine compliance with the provisions of 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations).

- (2) Confirmation of the VOC content of the coatings used in the aerosol spray paint touch-up operation is required to determine compliance with the 326 IAC 8-2-9 (Miscellaneous Metal and Plastic Parts Coating Operations) avoidance limit.
- (b) The dust collector, equipped with dry filters, for particulate control, shall be in operation and control emissions at all times that the pneumatic blasting operation is in operation.
- (c) The dry filters, for particulate control, shall be in operation and control emissions at all times that electrostatic powder paint booth PB1 is in operation.
- (d) The dry filters, for particulate control, shall be in operation and control emissions at all times that electrostatic powder paint booth PB2 is in operation.
- (e) There are no specific compliance determination requirements for the Paint Pot, mixing unit, degreasing operations, metal oxyfuel/plasma cutting machine, three (3) water heaters, five (5) stage washer, steam jenny washer, natural gas-fired bake ovens, natural gas-fired dry-off ovens, natural gas-fired comfort heaters, multi-gas laser trimmer, Whitney cutting machine, plate burner, hole burner, three (3) plasma/oxy-fuel head burners, handheld plasma/oxy-fuel torches, metal machining, and the welding operations, at this existing source.

*Compliance Monitoring*

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

<b>Emission Unit/Control</b>	<b>Operating Parameters</b>	<b>Frequency</b>
Spray paint booth dry filters	Inspections	Daily
Spray paint booth coating emissions and presence of overspray on the rooftops and the nearby ground	Inspections	Weekly and Monthly
Electrostatic powder paint booth dry filters	Inspections	Daily
Electrostatic powder paint booth coating emissions and presence of overspray on nearby surfaces	Inspections	Weekly
Pneumatic blasting operation dust collector, equipped with dry filters	Visible emissions	Once per week
	Pressure drop	Once per day

- (1) These monitoring conditions are necessary because the dry filters for the two (2) paint spray booths (#7 and PP1), must operate properly to ensure compliance with 326 IAC 6-3-2(d) (Work Practices And Control Technologies);
- (2) These monitoring conditions are necessary because the dry filters for electrostatic powder paint booth PB1 must operate properly to ensure compliance with 326 IAC 2-8-4 (FESOP) and 326 IAC 6-3-2(e) (Particulate Emission Limitations);
- (3) These monitoring conditions are necessary because the dry filters for electrostatic powder paint booth PB2 must operate properly to ensure compliance with 326 IAC 2-8-4 (FESOP);
- (4) These monitoring conditions are necessary because the dust collector, equipped with dry filters, for the pneumatic blasting operation, must operate properly to ensure compliance with 326 IAC 2-8-4 (FESOP) and 326 IAC 6-3-2(e) (Particulate Emission Limitations); and
- (5) There are no specific compliance monitoring requirements for the Paint Pot, aerosol spray paint touch-up operation, mixing unit, degreasing operations, metal oxyfuel/plasma cutting machine, three (3) water heaters, five (5) stage washer, steam jenny washer, natural gas-

fired bake ovens, natural gas-fired dry-off ovens, natural gas-fired comfort heaters, multi-gas laser trimmer, Whitney plasma cutting machine, plate burner, hole burner, three (3) plasma/oxy-fuel head burners, handheld plasma/oxy-fuel torches, metal machining, and the welding operations, at this existing source.

### *Testing*

There are still no specific testing requirements associated with any of the emission units, at this existing source.

### *Recordkeeping and Reporting*

- (a) The source shall maintain records of material and solvent usage, clean-up solvent usage, and VOC content in order demonstrate compliance with the VOC limits established for the two (2) paint spray booths (#7 and PP1), and the aerosol spray paint touch-up operation;
- (b) The source shall maintain records of the once per day dry particulate filter inspections, and the once per week and once per month overspray and coating emissions inspections established for the two (2) paint spray booths (#7 and PP1);
- (c) The source shall maintain records of the once per day dry particulate filter inspections, and the once per week and once per month overspray and coating emissions inspections established for the two (2) electrostatic powder paint booths (PB1 and PB2); and
- (d) The source shall maintain records of the daily visible emission notations and pressure drop readings for the pneumatic blasting operation dust collector.

## **Conclusion and Recommendation**

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on October 21, 2010. Additional information was received May 6, 2011.

The operation of this source shall be subject to the conditions of the attached proposed FESOP No. F093-30518-00010. The staff recommends to the Commissioner that this FESOP be approved.

## **IDEM Contact**

- (a) Questions regarding this proposed permit can be directed to Ms. Hannah Desrosiers 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) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.in.gov/idem](http://www.in.gov/idem)

**Appendix A: Emissions Calculations  
Emission Summary**

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

Uncontrolled Potential Emissions (tons/year)											
Category	Emissions Generating Activity										
	Pollutant	Surface Coating				Blasting Operation	Plasma Machine	Cutting Operations	Welding	Natural Gas Combustion	TOTAL
		Spray Coating (Units #7 & PP1)	Paint Pot & Aerosol Coating	Powder Coating							
				PB-1	PB-2						
Criteria Pollutants	PM	21.55	1.77	129.67	12.99	109.02	21.99	10.17	0.90	0.18	308.25
	PM10	21.55	1.77	129.67	12.99	93.76	21.99	10.17	0.90	0.73	293.53
	PM2.5	21.55	1.77	129.67	12.99	93.76	21.99	10.17	0.90	0.73	293.53
	SO2	0	0	0	0	0	0	0	0	0.06	0.06
	NOx	0	0	0	0	0	0	0	0	9.55	9.55
	VOC	13.67	2.71	0	0	0	0	0	0	0.53	16.90
	CO	0	0	0	0	0	0	0	0	8.03	8.03
	GHGs as CO2e	0	0	0	0	0	0	0	0	11,221.54	11,221.54
Hazardous Air Pollutants	2-Propoxyethanol	1.22	0.31	0	0	0	0	0	0	0	1.54
	Benzene	0	0	0	0	0	0	0	0	2.01E-04	2.01E-04
	Dichlorobenzene	0	0	0	0	0	0	0	0	1.15E-04	1.15E-04
	Di-N-Butyl Phthalate	0.07	0.03	0	0	0	0	0	0	0	0.10
	Formaldehyde	0	0	0	0	0	0	0	0	7.17E-03	7.17E-03
	Glycol Ether EP	0	0.05	0	0	0	0	0	0	0	0.05
	Hexane	0	0	0	0	0	0	0	0	0.17	0.17
	Toluene	0	0.49	0	0	0	0	0	0	3.25E-04	0.49
	Triethylamine	0.01	0.03	0	0	0	0	0	0	0	0.04
	Xylenes	0.06	0.55	0	0	0	0	0	0	0	0.61
	Antimony	0	0	0	0	0	3.53E-04	0	0	0	3.53E-04
	Arsenic	0	0	0	0	0	6.75E-03	0	0	0	0.01
	Cadmium	0	0	0	0	0	5.17E-05	0	0	1.05E-04	1.57E-04
	Chromium	0	0	0	0	0	0.26	0.65	2.95E-03	1.34E-04	0.91
	Cobalt	1.42E-03	5.53E-03	0	0	0	5.12E-04	0	1.68E-06	0	7.46E-03
	Lead	0	0	0	0	0	0.31	0	0	4.78E-05	0.31
	Manganese	0	0	0	0	0	0.13	0.13	0.54	3.63E-05	0.80
	Nickel	0	0	0	0	0	2.40E-04	0.45	1.70E-03	2.01E-04	0.45
	Selenium	0	0	0	0	0	0.71	0	0	0	0.71
	<b>Totals</b>	<b>1.365</b>	<b>1.470</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1.413</b>	<b>1.227</b>	<b>0.543</b>	<b>0.180</b>	<b>6.20</b>
									<b>Worse Case HAP</b>	<b>1.54</b>	

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

**Appendix A: Emissions Calculations  
Emission Summary**

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

Limited Potential Emissions (tons/year)											
Category	Pollutant	Emissions Generating Activity									
		Surface Coating		Blasting Operation <sup>(1)</sup>	Plasma Machine	Cutting Operations	Welding	Natural Gas Combustion	TOTAL		
		Spray Coating (Units #7 & PP1)	Paint Pot & Aerosol Coating							PB-1 <sup>(1)</sup>	PB-2 <sup>(1)</sup>
Criteria Pollutants	PM	21.55	1.77	12.97	1.30	5.45	21.99	10.17	0.90	0.18	76.29
	PM10	21.55	1.77	6.48	0.65	4.69	21.99	10.17	0.90	0.73	68.94
	PM2.5	21.55	1.77	6.48	0.65	4.69	21.99	10.17	0.90	0.73	68.94
	SO2	0	0	0	0	0	0	0	0	0.06	0.06
	NOx	0	0	0	0	0	0	0	0	9.55	9.55
	VOC	13.67	2.71	0	0	0	0	0	0	0.53	16.90
	CO	0.00	0.00	0	0	0	0	0	0	8.03	8.03
	GHGs as CO2e	0	0	0	0	0	0	0	0	11,221.54	11,221.54
Hazardous Air Pollutants	2-Propoxyethanol	1.22	0.31	0	0	0	0	0	0	0	1.54
	Benzene	0	0	0	0	0	0	0	0	2.01E-04	2.01E-04
	Dichlorobenzene	0	0	0	0	0	0	0	0	1.15E-04	1.15E-04
	Di-N-Butyl Phthalate	0.07	0.03	0	0	0	0	0	0	0	0.10
	Formaldehyde	0	0	0	0	0	0	0	0	7.17E-03	7.17E-03
	Glycol Ether EP	0	0.05	0	0	0	0	0	0	0	0.05
	Hexane	0	0	0	0	0	0	0	0	0.17	0.17
	Toluene	0	0.49	0	0	0	0	0	0	3.25E-04	0.49
	Triethylamine	0.01	0.03	0	0	0	0	0	0	0	0.04
	Xylenes	0.06	0.55	0	0	0	0	0	0	0	0.61
	Antimony	0	0	0	0	0	3.53E-04	0	0	0	3.53E-04
	Arsenic	0	0	0	0	0	6.75E-03	0	0	0	0.01
	Cadmium	0	0	0	0	0	5.17E-05	0	0	1.05E-04	1.57E-04
	Chromium	0	0	0	0	0	0.26	0.65	2.95E-03	1.34E-04	0.91
	Cobalt	1.42E-03	5.53E-03	0	0	0	5.12E-04	0	1.68E-06	0	7.46E-03
	Lead	0	0	0	0	0	0.31	0	0	4.78E-05	0.31
	Manganese	0	0	0	0	0	0.13	0.13	0.54	3.63E-05	0.80
	Nickel	0	0	0	0	0	2.40E-04	0.45	1.70E-03	2.01E-04	0.45
	Selenium	0	0	0	0	0	0.71	0	0	0	0.71
		<b>Totals</b>	<b>1.365</b>	<b>1.470</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1.413</b>	<b>1.227</b>	<b>0.543</b>	<b>0.180</b>
										<b>Worse Case HAP</b>	<b>1.54</b>

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

<sup>(1)</sup> Limited PTE based upon a pound per hour emission limitation to comply with 326 IAC 2-8 (FESOP). These emissions represent the PTE after control, with a minimum control efficiency of 95%. See pages 11, 12, and 13 of this Appendix, and pages 10 and 11 of 24 of the TSD for more details. The remaining emissions represent unlimited and uncontrolled PTE.

**Appendix A: Emissions Calculations  
VOC and Particulate Emissions  
From the Surface Coating Operations  
Spray Paint Booth #7**

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Material usage <sup>(1)</sup> (gal/yr)	Material usage (gal/hr)	Potential Material Usage (gal/day)	Material Usage (lb/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential to Emit VOC (lbs/hr)	Potential to Emit VOC (lbs/day)	*Actual VOC (lb/day)	Potential to Emit VOC (tons/year)	*Actual VOC (tons/yr)	Potential to Emit Particulate (tons/yr)	lb VOC/gal solids	Transfer <sup>(2)</sup>			
QAP835-WHT White Enamel	10.34	52.62%	38.49%	14.13%	47.78%	31.85%	39.74	0.02	0.48	0.21	2.80	1.46	0.03	0.71	0.2	0.13	0.03	0.24	4.59	45%			
WAD0093 Valspar Aquaspar 120 Tan	11.42	43.59%	29.62%	13.97%	na	37.49%	30.00	0.02	0.36	0.17	1.60	1.60	0.02	0.58	0.2	0.11	0.02	0.24	4.26	45%			
20-128B W/R C.R. Dark GrayPrimer (replacing QAP811Gry)	9.55	62.70%	47.90%	14.80%	54.90%	37.30%	901.50	0.46	10.95	4.36	3.13	1.41	0.64	15.48	5.2	2.82	0.64	3.91	3.79	45%			
<b>State Potential Emissions</b>	<b>Add worst case coating to all solvents</b>										<b>Total Potential to Emit (tons/yr)</b>				<b>Uncontrolled:</b>	<b>3.06</b>	<b>4.39</b>	<b>Control Efficiency:</b>	<b>0%</b>	<b>95.0%</b>	<b>Controlled:</b>	<b>3.06</b>	<b>0.22</b>

**NOTES**

na - not available

(1) Material usage (gal/yr), provided by the source, is based on an eight (8) hour day and 247 days per year (or 1976 hrs/yr).

Data taken from the opsEnvironmental™ (Software) Paint Usage Report, from 1/1/10 - 9/1/10, was utilized to determine paint usage. Eight months usage was extrapolated to 12 months: Paint usage/8 months \* 12/months

(2) Paint spray booth #7 utilizes an air atomization system to apply coatings, and is equipped with dry filters for particulate matter overspray control, with a transfer efficiency of 45%.

**METHODOLOGY**

Material usage (gal/hr) = Material usage (gal/yr) / (8 hrs/day \* 247 days/yr)

Potential Material Usage (gal/day) = Material usage (gal/hr) \* 24 hrs/day

Material Usage (lb/hr) = Material usage (gal/hr) \* Density (Lb/Gal)

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

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

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

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

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

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

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

Total Potential to Emit (tons/yr) = SUM(all coatings used) + SUM(solvents used)

\*Actual VOC (pounds per day) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* 8hrs

\*\*Actual VOC (tons per year) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (2920 hr/yr) \* (1 ton/2000 lbs)

**Appendix A: Emission Calculations  
HAP Emission Calculations  
From the Surface Coating Operations  
Spray Paint Booth #7**

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

Material	Density (Lb/Gal)	Material usage <sup>(1)</sup> (gal/hr)	Weight % Triethylamine	Weight % Xylene	Weight % 2-Propoxyethanol	Weight % Cobalt Compounds	Potential to Emit Triethylamine (ton/yr)	Potential to Emit Xylene (ton/yr)	Potential to Emit 2-Propoxyethanol (ton/yr)	Potential to Emit Cobalt Compounds (ton/yr)
QAP835-WHT White Enamel	10.34	0.02	0.34%	1.00%	2.66%	0.00%	3.10E-03	9.11E-03	2.42E-02	0
WAD0093 Valspar Aquaspar 102 Tan	11.42	0.02	0.80%	0.00%	0.00%	0.14%	6.08E-03	0	0	1.06E-03
20-128B W/R C.R. Dark GrayPrimer (replacing QAP811Gry)	9.55	0.46	0.00%	0.00%	1.20%	0.00%	0	0	2.29E-01	0
<b>Total Potential to Emit (tons/yr)</b>							<b>Individual HAPs: 9.17E-03</b>	<b>9.11E-03</b>	<b>0.25</b>	<b>1.06E-03</b>
							<b>Combined HAPs: 0.27</b>			

**NOTES**

(1) Material usage (gal/hr), taken from the previous VOC and Particulate Emissions page of this Appendix.

**METHODOLOGY**

Potential to Emit HAPS (tons/yr) = Density (lb/gal) \* Material usage (gal/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

Total Potential to Emit Individual HAPs (tons/yr) = SUM(Individual HAPs (tons/yr))

Total Potential to Emit Combined HAPs (tons/yr) = SUM(Total Individual HAPs (tons/yr))

**Appendix A: Emissions Calculations  
VOC and Particulate Emissions  
From the Surface Coating Operations  
Spray Paint Booth PP1**

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Material usage <sup>(1)</sup> (gal/yr)	Material usage (gal/hr)	Potential Material Usage (gal/day)	Material Usage (lb/hr)	VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential to Emit VOC (lbs/hr)	Potential to Emit VOC (lbs/day)	*Actual VOC (lb/day)	Potential to Emit VOC (tons/year)	*Actual VOC (tons/yr)	Potential to Emit Particulate (tons/yr)	lb VOC/gal solids	Transfer <sup>(2)</sup> Efficiency										
WAD0093 Valspar Aquaspar 102 Tan	11.42	43.59%	29.62%	14.0%	na	37.49%	10.00	0.005	0.12	0.06	1.60	1.60	0.01	0.19	0.06	0.04	0.01	0.08	4.26	45%										
20-128B W/R C.R. Dark Gray Primer (replacing 20-129A Columbia W/B Gray-Green Primer (replacing Q811GY347))	9.55	62.70%	47.90%	14.8%	54.90%	37.30%	2,341.50	1.185	28.44	11.32	3.13	1.41	1.67	40.20	13.40	7.34	1.65	10.17	3.79	45%										
QAP835-WHT White Enamel	10.34	52.62%	38.49%	14.1%	47.78%	31.85%	1.25	0.001	0.02	0.01	2.80	1.46	9.24E-04	0.02	0.01	4.05E-03	9.13E-04	0.01	4.59	45%										
Q8135-BLK Water Based Black Enamel	9.43	55.32%	43.43%	11.9%	49.17%	35.54%	322.50	0.163	3.92	1.54	2.21	1.12	0.18	4.39	1.46	0.80	0.18	1.66	3.15	45%										
QAP835 ROX Red Oxide Primer	10.10	55.31%	41.39%	13.9%	50.18%	30.23%	10.00	0.005	0.12	0.05	2.82	1.41	0.01	0.17	0.06	0.03	0.01	0.06	4.65	45%										
Q8990-6004 Waterbased Safety Blue	9.33	63.01%	51.43%	11.6%	57.60%	26.98%	3.00	0.002	0.04	0.01	2.55	1.08	1.64E-03	0.04	0.01	0.01	1.62E-03	0.01	4.00	45%										
VpCL-375 White Single Component (replaced AT335-3)	10.42	46.24%	43.79%	2.5%	53.38%	na	357.80	0.181	4.35	1.89	0.55	0.26	0.05	1.11	0.37	0.20	0.05	2.44	0.00	45%										
AT335-23 Ultrasolid Light Gray	10.03	48.05%	37.23%	10.8%	44.83%	42.27%	70.80	0.036	0.86	0.36	1.97	1.09	0.04	0.93	0.31	0.17	0.04	0.45	2.57	45%										
AT335-B-01 Ultrasolid Hardener	10.03	48.05%	37.23%	10.8%	44.83%	42.27%	7.16	0.004	0.09	0.04	1.97	1.09	3.93E-03	0.09	0.03	0.02	3.89E-03	0.05	2.57	45%										
<b>State Potential Emissions</b>															<b>Add worst case coating to all solvents</b>		<b>Total Potential to Emit (tons/yr)</b>		<b>Uncontrolled: 10.61</b>		<b>Control Efficiency: 0%</b>		<b>Controlled: 10.61</b>		<b>17.16</b>		<b>95.0%</b>		<b>0.86</b>	

**NOTES**

na - not available

(1) Material usage (gal/yr), provided by the source, is based on an eight (8) hour day and 247 days per year (or 1976 hrs/yr).

Data taken from the opsEnvironmental<sup>TM</sup> (Software) Paint Usage Report, from 1/1/10 - 9/1/10, was utilized to determine paint usage. Eight months usage was extrapolated to 12 months: Paint usage/8 months \* 12/months

(2) Paint spray booth PP1 utilizes an airless and air-assisted airless system to apply coatings, and is equipped with dry filters for particulate matter overspray control, with a transfer efficiency of 45%.

**METHODOLOGY**

Material usage (gal/hr) = Material usage (gal/yr) / (8 hrs/day \* 247 days/yr)

Potential Usage (gal/day) = Material usage (gal/hr) \* 24 hrs/day

Material Usage (lb/hr) = Material usage (gal/hr) \* Density (Lb/Gal)

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

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

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

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

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

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

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

Total Potential to Emit (tons/yr) = SUM(all coatings used) + SUM(solvents used)

\*Actual VOC (pounds per day) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* 8hrs

\*\*Actual VOC (tons per year) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (2920 hr/yr) \* (1 ton/2000 lbs)

**Appendix A: Emission Calculations**  
**HAP Emission Calculations**  
**From the Surface Coating Operations**  
**Spray Paint Booth PP1**

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

Material	Density (Lb/Gal)	Material usage <sup>(1)</sup> (gal/hr)	Weight % Di-N-Butyl Phthalate	Weight % Triethylamine	Weight % Xylene	Weight % 2-Propoxyethanol	Weight % Cobalt Compounds	Potential to Emit Di-N-Butyl Phthalate (ton/yr)	Potential to Emit Triethylamine (ton/yr)	Potential to Emit Xylene (ton/yr)	Potential to Emit 2-Propoxyethanol (ton/yr)	Potential to Emit Cobalt Compounds (ton/yr)	
WAD0093 Valspar Aquaspar 102 Tan	11.42	0.005	0.00%	0.80%	0.00%	0.00%	0.14%	0	2.03E-03	0	0	3.54E-04	
20-128B W/R C.R. Dark GrayPrimer (replacing QAP811Gry)	9.55	1.185	0.00%	0.00%	0.00%	1.20%	0.00%	0	0	0	5.95E-01	0	
20-129A Columbia W/B Gray-Green Primer (replacing Q811GY347)	8.75	0.332	0.00%	0.00%	0.00%	1.05%	0.00%	0	0	0	1.34E-01	0	
QAP835-WHT White Enamel	10.34	0.001	0.00%	0.34%	0.00%	2.66%	0.00%	0	9.74E-05	1.26E-06	7.62E-04	0	
Q8135-BLK Water Based Black Enamel	9.43	0.163	1.00%	0.00%	0.00%	0.00%	0.00%	6.74E-02	0	0	0	0	
QAP835 ROX Red Oxide Primer	10.10	0.005	0.00%	0.34%	0.00%	2.47%	0.00%	0	7.61E-04	9.40E-06	5.53E-03	0	
Q8990-6004 Waterbased Safety Blue	9.33	0.002	0.00%	0.29%	0.01%	0.00%	0.00%	0	1.80E-04	7.1349E-06	0	0	
VpCL-375 White Single Component (replaced AT335-3)	10.42	0.181	0.00%	0.00%	0.00%	0.00%	0.00%	0	0	0	0	0	
AT335-23 Ultrasolid Light Gray	10.03	0.036	0.00%	0.00%	1.67%	7.44%	0.00%	0	0	2.63E-02	1.17E-01	0	
AT335-B-01 Ultrasolid Hardener	10.03	0.036	0.00%	0.00%	1.67%	7.44%	0.00%	0	0	2.63E-02	1.17E-01	0	
<b>Total Potential to Emit (tons/yr)</b>								<b>Individual HAPs:</b>	<b>0.07</b>	<b>3.06E-03</b>	<b>0.05</b>	<b>0.97</b>	<b>3.54E-04</b>
								<b>Combined HAPs:</b>	<b>1.09</b>				

**NOTES**

(1) Material usage (gal/hr), taken from the previous VOC and Particulate Emissions page of this Appendix.

**METHODOLOGY**

Potential to Emit HAPS (tons/yr) = Density (lb/gal) \* Material usage (gal/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

Total Potential to Emit Individual HAPs (tons/yr) = SUM(Individual HAPs (tons/yr))

Total Potential to Emit Combined HAPs (tons/yr) = SUM(Total Individual HAPs (tons/yr))

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

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Material usage (gal/hr)	Potential Material Usage (gal/day)	Material Usage (lb/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential to Emit VOC (lbs/hr)	Potential to Emit VOC (lbs/day)	*Actual VOC (lb/day)	Potential to Emit VOC (tons/year)	*Actual VOC (tons/yr)	Potential to Emit Particulate (tons/yr)	lb VOC/gal solids	Transfer Efficiency
WAD0093 Valspar Aquaspar 102 Tan	11.42	43.59%	29.62%	13.97%	na	37.49%	0.079	1.90	0.90	1.60	1.60	0.13	3.02	1.01	0.55	0.12	1.23	4.26	45%
20-128B W/R C.R. Dark GrayPrimer (replacing QAP811Gry)	9.55	62.70%	47.90%	14.8%	54.90%	37.30%	0.078	1.87	0.74	3.13	1.41	0.11	2.65	0.88	0.48	0.11	0.67	3.79	45%
20-129A Columbia W/B Gray-Green Primer (replacing Q811GY347)	8.75	67.94%	52.19%	15.8%	19.10%	30.70%	0.078	1.87	0.68	1.70	1.38	0.11	2.58	0.86	0.47	0.11	0.53	4.49	45%
QAP835-WHT White Enamel	10.34	52.62%	38.49%	14.1%	47.78%	31.85%	0.079	1.90	0.82	2.80	1.46	0.12	2.77	0.92	0.51	0.11	0.93	4.59	45%
Q8135-BLK Water Based Black Enamel	9.43	55.32%	43.43%	11.89%	49.17%	35.54%	0.079	1.90	0.74	2.21	1.12	0.09	2.13	0.71	0.39	0.09	0.80	3.15	45%
QAP835 ROX Red Oxide Primer	10.10	55.31%	41.39%	13.92%	50.18%	30.23%	0.078	1.87	0.79	2.82	1.41	0.11	2.63	0.88	0.48	0.11	0.85	4.65	45%
Q8990-6004 Waterbased Safety Blue	9.33	63.01%	51.43%	11.58%	57.60%	26.98%	0.079	1.90	0.74	2.55	1.08	8.54E-02	2.05	0.68	0.37	8.43E-02	0.66	4.00	45%
VpCL-375 White Single Component (replaced AT335-3)	10.42	46.24%	43.79%	2.45%	53.38%	na	0.079	1.90	0.82	0.55	0.26	0.02	0.48	0.16	0.09	0.02	1.07	0.00	45%
AT335-23 Ultrasolid Light Gray	10.03	48.05%	37.23%	10.82%	44.83%	42.27%	0.079	1.90	0.79	1.97	1.09	0.09	2.06	0.69	0.38	0.08	0.99	2.57	45%
AT335-B-01 Ultrasolid Hardener	10.03	48.05%	37.23%	10.82%	44.83%	42.27%	0.079	1.90	0.79	1.97	1.09	8.57E-02	2.06	0.69	0.38	8.47E-02	0.99	2.57	45%
<b>State Potential Emissions</b>	<b>Add worst case coating to all solvents</b>											<b>Total Worst-Case" Potential to Emit (tons/yr)</b>		<b>Uncontrolled: 0.55</b>	<b>1.23</b>				
														<b>Control Efficiency: 0%</b>	<b>95.0%</b>				
														<b>Controlled: 0.55</b>	<b>0.06</b>				

**NOTES**

- na - not available
- The Paint Pot is a transportable standalone (pressurized) paint container that is used on an as needed basis in the coating booths (#7 and PP1). It is used when there is a need to apply a different coating than is currently in use in the booth, such as when an order for several tanks of a different color comes in. Rather than taking the time to change out the color being used in the booth for these few tanks, the paint pot is used.
- The same coatings used in the paint booths are used in the paint pot. The paint pot has only one sprayer, and can apply only one coating at a time.
- (1) Material usage (gal/yr), provided by the source, is based on an eight (8) hour day and 247 days per year (or 1976 hrs/yr).
- Data taken from the opsEnvironmental™ (Software) Paint Usage Report, from 1/1/10 - 9/1/10, was utilized to determine paint usage. Eight months usage was extrapolated to 12 months: Paint usage/8 months \* 12/months
- (2) The Paint Pot is equipped with an airless system to apply coatings, with a transfer efficiency of 45%. Also, the unit is used in the paint booths (#7 and PP1), which are equipped with dry filters for particulate matter overspray control.

**METHODOLOGY**

Potential Usage (gal/day) = Material usage (gal/hr) \* 24 hrs/day  
 Material Usage (lb/hr) = Material usage (gal/hr) \* Density (Lb/Gal)  
 Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)  
 Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)  
 Potential to Emit VOC (pounds per hour) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
 Potential to Emit VOC (pounds per day) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
 Potential to Emit VOC (tons per year) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
 Potential to Emit Particulate (tons per year) = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
 Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
 Total Worst-Case" Potential to Emit (tons/yr) = MAX(all coatings used) + SUM(solvents used)  
 \*Actual VOC (pounds per day) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \*8hrs  
 \*\*Actual VOC (tons per year) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (2920 hr/yr) \* (1 ton/2000 lbs)

**Appendix A: Emission Calculations**  
**HAP Emission Calculations**  
**From the Surface Coating Operations**  
**Paint Pot**

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

Material	Density (Lb/Gal)	Material usage <sup>(1)</sup> (gal/hr)	Weight % Di-N-Butyl Phthalate	Weight % Triethylamine	Weight % Xylene	Weight % 2-Propoxyethanol	Weight % Cobalt Compounds	Potential to Emit Di-N-Butyl Phthalate (ton/yr)	Potential to Emit Triethylamine (ton/yr)	Potential to Emit Xylene (ton/yr)	Potential to Emit 2-Propoxyethanol (ton/yr)	Potential to Emit Cobalt Compounds (ton/yr)	
WAD0093 Valspar Aquaspar 102 Tan	11.42	0.079	0.00%	0.80%	0%	0%	0.14%	0	3.16E-02	0	0	5.53E-03	
20-128B W/R C.R. Dark GrayPrimer (replacing QAP811Gry)	9.55	0.078	0%	0%	0%	1.20%	0%	0	0	0	3.92E-02	0	
20-129A Columbia W/B Gray-Green Primer (replacing Q811GY347)	8.75	0.078	0%	0%	0%	1.05%	0%	0	0	0	3.14E-02	0	
QAP835-WHT White Enamel	10.34	0.079	0%	0.34%	0.004%	2.66%	0%	0	1.22E-02	1.57E-04	9.52E-02	0	
Q8135-BLK Water Based Black Enamel	9.43	0.079	1.00%	0%	0%	0%	0%	3.26E-02	0	0	0	0	
QAP835 ROX Red Oxide Primer	10.10	0.078	0%	0.34%	0.004%	2.47%	0%	0	1.17E-02	1.45E-04	8.52E-02	0	
Q8990-6004 Waterbased Safety Blue	9.33	0.079	0%	0.29%	0.01%	0%	0%	0	9.36E-03	3.71E-04	0	0	
VpCL-375 White Single Component (replaced AT335-3)	10.42	0.079	0%	0%	0%	0%	0%	0	0	0	0	0	
AT335-23 Ultrasolid Light Gray	10.03	0.079	0%	0%	1.67%	7.44%	0%	0	0	5.80E-02	2.58E-01	0	
AT335-B-01 Ultrasolid Hardener	10.03	0.079	0%	0%	1.67%	7.44%	0%	0	0	5.80E-02	2.58E-01	0	
<b>Total Worst-Case" Potential to Emit (tons/yr)</b>								<b>Individual HAPs:</b>	<b>0.03</b>	<b>0.03</b>	<b>0.06</b>	<b>0.26</b>	<b>5.53E-03</b>
								<b>Combined HAPs:</b>	<b>0.39</b>				

**NOTES**

(1) Material usage (gal/hr), taken from the previous VOC and Particulate Emissions page of this Appendix.

**METHODOLOGY**

Potential to Emit HAPS (tons/yr) = Density (lb/gal) \* Material usage (gal/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

"Worst-case" Total Potential to Emit Individual HAPs (tons/yr) = MAX(Individual HAPs emissions (tons/yr))

"Worst-case" Total Potential to Emit Combined HAPs (tons/yr) = SUM("Worst-case" Total Individual HAPs emissions (tons/yr))

**Appendix A: Emissions Calculations  
VOC and Particulate Emissions  
From the Surface Coating Operations  
Aerosol Paint Use for Touch-Up**

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water and/or exempt solvents	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Material usage (gal/yr)	Material usage (gal/hr)	Potential Material Usage (gal/day)	Material Usage (lb/hr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential to Emit VOC (lbs/hr)	Potential to Emit VOC (lbs/day)	*Actual VOC (lb/day)	Potential to Emit VOC (tons/year)	*Actual VOC (tons/yr)	Potential to Emit Particulate (tons/yr)	lb VOC/gal solids	Transfer Efficiency
Touch Up Paint	6.80	51.90%	3.00%	48.90%	na	na	216	0.11	2.62	0.74	3.33	3.33	0.36	8.72	2.91	1.59	0.36	0.55	na	65%
20-128A Dark Gray Primer	9.50	82.00%	34.65%	47.35%	35.16%	52.68%				1.04	6.94	4.50	0.49	11.80	3.93	2.15	0.49	0.29	na	65%
Hi-Tech Safety Yellow	7.51	62.60%	17.30%	45.30%	na	20.00%				0.82	3.40	3.40	0.37	8.92	2.97	1.63	0.37	0.47	17.00	65%
<b>State Potential Emissions</b>							<b>Add worst case coating to all solvents</b>			<b>Total "Worst-Case" Potential to Emit (tons/yr)</b>			<b>Uncontrolled:</b>			<b>2.15</b>	<b>0.49</b>	<b>0.55</b>		

**NOTES**

na - not available

(1) Material usage (gal/yr), provided by the source, is based on an eight (8) hour day and 247 days per year (or 1976 hrs/yr).

Data taken from the opsEnvironmental™ (Software) Paint Usage Report, from 1/1/10 - 9/1/10, was utilized to determine paint usage. Eight months usage was extrapolated to 12 months: Paint usage/8 months \* 12/months  
Emissions were calculated using the combined max material usage and the "worst-case" coating.

(2) The aerosol spray paint operation, using hand-held aerosol cans for touch-up purposes only, has a transfer efficiency of 65%. This operation is uncontrolled.

**METHODOLOGY**

Density (lb/gal) = Specific gravity \* 8.34 lbs/gal (Density of water), or as-supplied information obtained from the coating manufacturer.

Material usage (gal/hr) = Material usage (gal/yr) / (8 hrs/day \* 247 days/yr)

Potential Usage (gal/day) = Material usage (gal/hr) \* 24 hrs/day

Material Usage (lb/hr) = Material usage (gal/hr) \* Density (Lb/Gal)

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

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

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

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

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

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

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

Total Worst-Case\* Potential to Emit (tons/yr) = MAX(all coatings used) + SUM(solvents used)

\*Actual VOC (pounds per day) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* 8hrs

\*\*Actual VOC (tons per year) = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (2920 hr/yr) \* (1 ton/2000 lbs)

**Appendix A: Emission Calculations**  
**HAP Emission Calculations**  
**From the Surface Coating Operations**  
**Aerosol Use**

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

Material	Density (Lb/Gal)	Material usage <sup>(1)</sup> (gal/hr)	Weight % Toluene	Weight % Xylene	Weight % 2-Propoxyethanol	Weight % Glycol Ether EP*	Potential to Emit Toluene (ton/yr)	Potential to Emit Xylene (ton/yr)	Potential to Emit 2-Propoxyethanol (ton/yr)	Potential to Emit Glycol Ether* EP (ton/yr)	
Touch Up Paint	6.80	0.11	15.00%	15.00%	0%	0%	4.88E-01	4.88E-01	0	0	
20-128A Dark Gray Primer	9.50		0%	0%	1.20%	0%	0	0	5.46E-02	0	
Hi-Tech Safety Yellow	7.51		11.27%	0%	0%	1.47%	4.05E-01	0	0	5.28E-02	
<b>"Worst-case" Total Potential to Emit (tons/yr)</b>							<b>Individual HAPs:</b>	<b>0.49</b>	<b>0.49</b>	<b>0.05</b>	<b>0.05</b>
							<b>Combined HAPs:</b>	<b>1.08</b>			

**NOTES**

(1) Material usage (gal/hr), taken from the previous VOC and Particulate Emissions page of this Appendix.

\*Glycol Ether EP is also known as Propyl Cellulose.

**METHODOLOGY**

Potential to Emit HAPS (tons/yr) = Density (lb/gal) \* Material usage (gal/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

"Worst-case" Total Potential to Emit Individual HAPs (tons/yr) = MAX(Individual HAPs emissions (tons/yr))

"Worst-case" Total Potential to Emit Combined HAPs (tons/yr) = SUM("Worst-case" Total Individual HAPs emissions (tons/yr))

**Appendix A: Emissions Calculations  
Particulate (PM/PM10/PM2.5) Emissions  
From the NEW Main Lines Powder Coating Operation**

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

Emission Unit	Weight % Solids	Maximum Material Usage (lbs/unit)	Maximum Throughput Capacity (units/hr)	Maximum Material Usage (lbs/hr)	Transfer Efficiency (%)	Uncontrolled Potential to Emit PM/PM10/PM2.5* (lbs/hr)	Uncontrolled Potential to Emit PM/PM10/PM2.5* (tons/year)
Powder Paint Booth PB1 Painter 1	100%	2.632	22.5	59.2	75%	14.80	64.84
Powder Paint Booth PB1 Painter 2	100%	2.632	22.5	59.2	75%	14.80	64.84
<b>Total Potential to Emit (tons/yr)</b>						<b>Uncontrolled PM/PM10/PM2.5:</b>	<b>29.61</b>
						<b>PM Control Efficiency:</b>	<b>90%</b>
						<b>Controlled PM:</b>	<b>2.96</b>
						<b>PM10/PM2.5 Control Efficiency:</b>	<b>95%</b>
						<b>Controlled PM10/PM2.5:</b>	<b>1.48</b>
							<b>129.67</b>
							<b>12.97</b>
							<b>6.48</b>

**NOTES**

PTE = Potential to Emit  
 \* PM, PM10, and PM 2.5 emissions are assumed equal  
 This electrostatic spray coating operation does not use any VOC containing solvent to liquefy the powder coating, therefore, VOC emissions have been determined negligible.  
 Based on information provided by the source, HAP emissions have been determined negligible.  
 Transfer efficiency for manual electrostatic air-atomized spray coating, as listed in AP 40, pg 859-861, is 75%.  
 Controlled PM emissions based on a minimum cartridge filter control efficiency of 90.0 %.  
 Controlled PM10/PM2.5 emissions based on a minimum cartridge filter control efficiency of 95.0 %.

**METHODOLOGY**

Maximum Material Usage  
 Largest tank size 36" X 124" = 100 Sq Ft surface area  
 1.0 pound material will cover approximately 114 sq ft @ 1 mil.  
 Coating will be applied at 2 - 3 mil thickness, therefore, the worst-case application rate (3.0 mils) was used.  
 1.0 lb material will cover 38 sq ft @ 3.0 mils  
 100 sq ft surface area / 38 sq ft = 2.632 lbs material used per tank

Maximum Units/Hour  
 Line speed 3 FPM (variable)  
 The maximum units/hour is calculated by how many 36" X 124" tanks can be hung on the line (3 tanks every 12')  
 3 FPM X 60 Min = 180 FPM  
 180/12 \*3 (tanks on a 12' bar) = 45 tanks per hour. There are 2 painters, with each painter painting 1/2 of the tank = 22.5 tanks per hour, each.

Uncontrolled PTE PM/PM10/PM2.5 (lbs/hr) = Weight % Solids \* Maximum Material Usage (lbs/unit) \* Maximum Throughput Capacity (units/hr) \* (1 - (Transfer Efficiency (%)  
 Uncontrolled PTE PM/PM10/PM2.5 (tons/year) = Uncontrolled PTE PM/PM10/PM2.5 (lbs/hr) \* 8760 hours/year \* 1 ton/2000 lb  
 Controlled PTE PM/PM10/PM2.5 (tons/yr) = Uncontrolled PTE PM/PM10/PM2.5 (tons/year) \* (1 - (Control Efficiency (%) / 100)

**326 IAC 6-3-2(e) Allowable Rate of Emissions**

Unit ID	*** Process Weight Rate (total materials throughput) (lbs/hr)	Process Weight Rate (tons/hr)	Allowable PM Emissions (lbs/hr)
Powder Paint Booth PB1 Painter 1	9,753	4.88	11.85
Powder Paint Booth PB1 Painter 2	9,753	4.88	11.85

**METHODOLOGY**

\*\*\*Process weight; weight rate: Total weight of all materials introduced into any source operation (326 IAC 1-2-59(a))  
 Allowable Emissions (lb/hr) = 4.10(Process Weight Rate (lb/hr)<sup>0.67</sup>  
 Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)\*8760)/2000  
 The dry filters shall be in operation and maintained according to manufacturer's specifications, at all times the powder coating equipment is in operation, in order to comply with this limit.

**Appendix A: Emissions Calculations  
Particulate (PM/PM10/PM2.5) Emissions  
From the NEW Main Lines Powder Coating Operation**

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

Emission Unit	Weight % Solids	Maximum Material Usage (lbs/unit)	Maximum Throughput Capacity (units/hr)	Maximum Material Usage (lbs/hr)	Transfer Efficiency (%)	Uncontrolled Potential to Emit PM/PM10/PM2.5* (lbs/hr)	Uncontrolled Potential to Emit PM/PM10/PM2.5* (tons/year)	
Powder Paint Booth PB2	100%	8.895	1.33	11.86	75%	2.96	12.99	
<b>Total Potential to Emit (tons/yr)</b>						<b>Uncontrolled PM/PM10/PM2.5:</b>	<b>2.96</b>	<b>12.99</b>
						<b>PM Control Efficiency:</b>	<b>90%</b>	<b>90%</b>
						<b>Controlled PM:</b>	<b>0.30</b>	<b>1.30</b>
						<b>PM10/PM2.5 Control Efficiency:</b>	<b>95%</b>	<b>95%</b>
						<b>Controlled PM10/PM2.5:</b>	<b>0.15</b>	<b>0.65</b>

**NOTES**

PTE = Potential to Emit  
 \* PM, PM10, and PM 2.5 emissions are assumed equal  
 This electrostatic spray coating operation does not use any VOC containing solvent to liquefy the powder coating, therefore, VOC emissions have been determined negligible Based on information provided by the source, HAP emissions have been determined negligible.  
 Transfer efficiency for manual electrostatic air-atomized spray coating, as listed in AP 40, pg 859-861, is 75%.  
 Controlled PM emissions based on a minimum cartridge filter control efficiency of 90.0 %.  
 Controlled PM10/PM2.5 emissions based on a minimum cartridge filter control efficiency of 95.0 %.

**METHODOLOGY**

Maximum Material Usage  
 Largest tank size 60" X 240" = 338 Sq Ft surface area  
 1 .0 pound material will cover approximately 114 sq ft @ 1 mil.  
 Coating will be applied at 2 - 3 mil thickness, therefore, the worst-case application rate (3.0 mils) was used.  
 1.0 lb material will cover 38 sq ft @ 3.0 mils  
 338 sq ft surface area / 38 sq ft = 8.895 lbs material used per tank

Maximum Units/Hour  
 This is a batch line. Once painted, the tank will be placed in the cure oven, taking approximately 1.0 hour to cure. With the cure oven taken approximately 1 hour to cure, the source will be limited on the number of tanks that can be painted per hour. The source will be able to paint one tank every 45 minutes  
 24 hours per day X 60 minutes = 1440 minutes  
 1440 minutes/45 minutes = 32 tanks per day  
 32 tanks/24 hours = 1.33 tanks per hour

Uncontrolled PTE PM/PM10/PM2.5 (lbs/hr) = Weight % Solids \* Maximum Material Usage (lbs/unit) \* Maximum Throughput Capacity (units/hr) \* (1 - (Transfer Efficiency (%)  
 Uncontrolled PTE PM/PM10/PM2.5 (tons/year) = Uncontrolled PTE PM/PM10/PM2.5 (lbs/hr) \* 8760 hours/year \* 1 ton/2000 lb  
 Controlled PTE PM/PM10/PM2.5 (tons/yr) = Uncontrolled PTE PM/PM10/PM2.5 (tons/year) \* (1 - (Control Efficiency (%) / 100)

**326 IAC 6-3-2(e) Allowable Rate of Emissions**

Unit ID	*** Process Weight Rate (total materials throughput) (lbs/hr)	Process Weight Rate (tons/hr)	Allowable PM Emissions (lbs/hr)
Powder Paint Booth PB2	19,509	9.75	18.86

**METHODOLOGY**

\*\*\*Process weight; weight rate: Total weight of all materials introduced into any source operation (326 IAC 1-2-59(a))  
 Allowable Emissions (lb/hr) = 4.10(Process Weight Rate (lb/hr))^0.67  
 Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)\*8760)/2000  
 The dry filters shall be in operation and maintained according to manufacturer's specifications, at all times the powder coating equipment is in operation, in order to comply with this limit.

**Appendix A: Emission Calculations**  
**Abrasive Blasting - Confined**

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

**Table 1 - Emission Factors for Abrasives**

Abrasive	Emission Factor (EF)	
	lb PM / lb abrasive	lb PM10 / lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	

**Table 2 - Density of Abrasives (lb/ft3)**

Abrasive	Density (lb/ft3)
Al oxides	160
Sand	99
Steel	487

**Table 3 - Sand Flow Rate (FR1) Through Nozzle (lb/hr)**

Flow rate (FR1) of sand through a blasting nozzle as a function of nozzle pressure and internal diameter (ID1)

Nozzle Type (diameter)	Internal diameter, in	Nozzle Pressure (psig)							
		30	40	50	60	70	80	90	100
No. 2 (1/8 inch)	0.125	28	35	42	49	55	63	70	77
No. 3 (3/16 inch)	0.1875	65	80	94	107	122	135	149	165
No. 4 (1/4 inch)	0.25	109	138	168	195	221	255	280	309
No. 5 (5/16 inch)	0.3125	205	247	292	354	377	420	462	507
No. 6 (3/8 inch)	0.375	285	355	417	477	540	600	657	720
No. 7 (7/16 inch)	0.4375	385	472	560	645	755	820	905	940
No. 8 (1/2 inch)	0.5	503	615	725	835	945	1050	1160	1265
No. 10 (5/8 inch)	0.625	820	990	1170	1336	1510	1680	1850	2030
No. 12 (3/4 inch)	0.75	1140	1420	1670	1915	2160	2400	2630	2880
No. 16 (1 inch)	1.0	2030	2460	2900	3340	3780	4200	4640	5060

**CALCULATIONS**

Adjusting Flow Rates for Different Abrasives and Nozzle Diameters	
Flow Rate (FR) = Abrasive flow rate (lb/hr) of abrasive at nozzle pressure and internal nozzle diameter (ID)	
D1 = Density of sand from Table 2 =	99 lb/ft3
ID1 = Internal diameter of nozzle for sand blasting from Table 3 =	0.5 inch
FR1 = Sand flow rate at nozzle pressure and internal diameter (ID1) from Table 3 =	1265 lb/hr
D = Density of actual abrasive =	487 lb/ft3
ID = internal diameter of actual nozzle =	0.5 inch
FR = Flow rate of actual abrasive (lb/hr) =	6222.8 lb/hr (per nozzle)

Potential to Emit Before Control	
FR = Flow rate of actual abrasive (lb/hr) =	6222.8 lb/hr (per nozzle)
w = fraction of time of wet blasting =	0 %
N = number of nozzles =	1
EF = PM emission factor for actual abrasive from Table 1 =	0.004 lb PM / lb abrasive
PM10 emission factor ratio for actual abrasive from Table 1 =	0.86 lb PM10 / lb PM
<b>Potential to Emit (before control) =</b>	<b>PM      PM10*</b>
=	24.89    21.41 lb/hr
=	597.39   513.75 lb/day
=	109.02   93.76 ton/yr

Potential to Emit After Control	
<b>Emission Control Device Efficiency =</b>	<b>PM      PM10</b>
=	95.0%   95.0%
<b>Potential to Emit (after control) =</b>	<b>1.24    1.07 lb/hr</b>
=	29.87   25.69 lb/day
=	5.45    4.69 ton/yr

**NOTES**

\* In the absence of valid PM2.5 emission factors, it is assumed that PM2.5 emissions = PM10 emission:  
Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

**METHODOLOGY**

Flow rate of actual abrasive (FR) (lb/hr) = FR1 x (ID/ID1)<sup>2</sup> x (D/D1)  
Potential to Emit (before control) = EF x FR x (1 - w/200) x N (where w should be entered in as a whole number (if w is 50%, enter 50))  
Potential to Emit (after control) = [Potential to Emit (before control)] \* [1 - control efficiency]  
Potential to Emit (tons/year) = [Potential to Emit (lbs/hour)] x [8760 hours/year] x [ton/2000 lbs]

**326 IAC 6-3-2(e) Allowable Rate of Emissions**

Unit ID	Process Rate (lbs/hr)	Process Weight Rate* (tons/hr)	Allowable Emissions (lbs/hr)
Shotblasting	25,723	12.86	22.70

**METHODOLOGY**

\*Process weight; weight rate: Total weight of all materials introduced into any source operation (326 IAC 1-2-59(a)).  
Allowable Emissions (lb/hr) = 4.10(Process Weight Rate (lb/hr))<sup>0.67</sup>  
Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr)\*8760)/2000

**Appendix A: Emissions Calculations  
Metal Oxyfuel/Plasma Cutting Machine**

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

<b>Plasma Cutting Emission Factors (lb/hr cutting)</b>			
<b>Pollutant</b>	<b>Mild Steel</b>	<b>Aluminum</b>	<b>Stainless Steel</b>
PM	1.70E+00	5.02E+00	1.28E+00
Arsenic	1.70E-04	1.54E-03	1.23E-03
Cadmium	1.18E-05	7.48E-07	0.00E+00
Chromium	5.80E-05	2.65E-04	5.85E-02
Manganese	1.60E-02	8.76E-04	7.08E-02
Nickel	4.04E-04	7.03E-05	3.05E-02
Phosphorus	7.00E-04	7.38E-04	4.21E-04
Lead	1.17E-04	7.88E-05	2.89E-06
Antimony	5.05E-06	8.07E-05	0.00E+00
Selenium	5.48E-05	8.07E-06	5.11E-05

*Note: Emission factors (lb/hr cutting) are supplied by manufacturer.*

<b>Pollutant</b>	<b>Uncontrolled</b>						<b>Controlled</b>		
	<b>Emission Rate in lb/yr</b>			<b>Emission Rate in ton/yr cutting</b>			<b>Emission Rate in ton/yr cutting</b>		
	<b>Mild Steel</b>	<b>Aluminum</b>	<b>Stainless Steel</b>	<b>Mild Steel</b>	<b>Aluminum</b>	<b>Stainless Steel</b>	<b>Mild Steel</b>	<b>Aluminum</b>	<b>Stainless Steel</b>
<b>PM</b>	14,892.00	43,975.20	11,212.80	7.45	<b>21.99</b>	5.61	0.07	<b>0.22</b>	0.06
Antimony	0.04	0.71	0	2.21E-05	3.53E-04	0	2.21E-07	3.53E-06	0
Arsenic	1.49	13.49	10.77	7.45E-04	6.75E-03	5.39E-03	7.45E-06	6.75E-05	5.39E-05
Cadmium	0.10	0.01	0	5.17E-05	3.28E-06	0	5.17E-07	3.28E-08	0
Chromium	0.51	2.32	512.46	2.54E-04	1.16E-03	2.56E-01	2.54E-06	1.16E-05	2.56E-03
Lead	1.02	0.69	0.03	5.12E-04	3.45E-04	1.27E-05	5.12E-06	3.45E-06	1.27E-07
Manganese	140.16	7.67	620.21	7.01E-02	3.84E-03	<b>3.10E-01</b>	7.01E-04	3.84E-05	<b>3.10E-03</b>
Nickel	3.54	0.62	267.18	1.77E-03	3.08E-04	1.34E-01	1.77E-05	3.08E-06	1.34E-03
Selenium	0.48	0.07	0.45	2.40E-04	3.53E-05	2.24E-04	2.40E-06	3.53E-07	2.24E-06
<b>HAP Total</b>	<b>147.30</b>	<b>24.87</b>	<b>1411.10</b>	<b>7.37E-02</b>	<b>1.24E-02</b>	<b>7.06E-01</b>	<b>7.37E-04</b>	<b>1.24E-04</b>	<b>7.06E-03</b>

**NOTES**

Emission Factors supplied by manufacturer.

The metal oxyfuel/plasma cutting machine consists of one (1) plasma torch and two (2) oxyfuel torches. It has the ability to cut using one plasma torch, one oxyfuel torch, or two oxyfuel torches simultaneously. Potential emissions provided for the plasma cutting torch is the worst case scenario for this cutting machine.

Potential emissions based on assumption that each material is used 8,760 hours.

Controlled emissions based on cartridge filter control efficiency of 99.0 %

Worst case HAP = Manganese

**METHODOLOGY**

Uncontrolled Emission Rate (lb/yr) = Plasma Cutting Emission Factors (lb/hr cutting) \* 8760 (hrs/yr)

Uncontrolled Emission Rate (ton/yr) = Uncontrolled Emission Rate (lb/yr) \* (1 ton/2000 lbs)

Controlled Emission Rate (ton/yr) = Uncontrolled Emission Rate (ton/yr) \* (1 - control efficiency)

**Appendix A: Emissions Calculations  
Metal Cutting Operations**

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

Emission unit	Max combo of thickness & speed		Avg. Cut Width (inches)
	Thickness (In)	Speed (IPM)	
Whitney Plasma	0.75	55	0.10
Head Burner ML Plasma (40 amp)	0.75	44	0.10
Head Burner ML Oxyfuel (hole burner)	1.50	18	0.10
Head Burner Line 5 Plasma (100 amp)	1.00	137	0.10
Head Burner Line 7 Plasma (100 amp)	1.00	137	0.10
Oxy Fuel Burner (Table outside) (plate burner)	1.50	14.5	0.10
Hand held oxy fuel units	1.50	18	0.10
Hand held plasma units	1.00	137	0.10

CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 8mm thick)				EMISSIONS lbs/hr				Total HAPS (tons/yr)
				PM*	Mn	Ni	Cr	PM*	Mn	Ni	Cr	
Whitney Plasma	1	0.75	55	0.0039	0.0128	0.044	0.064	0.031	3.92E-04	1.34E-03	1.96E-03	0.004
Head Burner ML Plasma (40 amp)	1	0.75	44	0.0039	0.0128	0.044	0.064	0.025	3.14E-04	1.07E-03	1.57E-03	0.003
Head Burner ML Oxyfuel	1	1.50	18	0.0039	0.0128	0.044	0.064	0.020	2.57E-04	8.79E-04	1.28E-03	0.002
Head Burner Line 5 Plasma (100 amp)	1	1.00	137	0.0039	0.0128	0.044	0.064	0.102	1.30E-03	4.46E-03	6.51E-03	0.012
Head Burner Line 7 Plasma (100 amp)	1	1.00	137	0.0039	0.0128	0.044	0.064	0.102	1.30E-03	4.46E-03	6.51E-03	0.012
Oxy Fuel Burner (Table outside)	1	1.50	14.5	0.0039	0.0128	0.044	0.064	0.016	2.07E-04	7.08E-04	1.03E-03	0.002
Hand held oxy fuel units	25	1.50	18	0.0039	0.0128	0.044	0.064	0.501	6.42E-03	0.022	0.032	0.060
Hand held plasma units	15	1.00	137	0.0039	0.0128	0.044	0.064	1.527	0.020	0.067	0.098	0.184
<b>TOTAL POTENTIAL EMISSIONS</b>												
Emissions (lbs/hr)								2.32	0.03	0.10	0.15	0.28
Emissions (lbs/day)								55.75	0.71	2.44	3.57	6.72
<b>Emissions (tons/year)</b>								<b>10.17</b>	<b>0.13</b>	<b>0.45</b>	<b>0.65</b>	<b>1.23</b>

**NOTES**

\*In the absence of valid emission factors, it is assumed that PM10 and PM2.5 emissions = PM emissions  
 Emission Factor for plasma cutting from American Welding Society (AWS).

**METHODOLOGY**

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick  
 Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)(1E-3)(Metal Thickness/8mm=0.315"Thick)  
 Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8mm thick)  
 Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day  
 Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

**Appendix A: Emissions Calculations  
Welding - Insignificant Activity**

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

Welding Type	Actual Weld Wire Usage (1000 lbs/year)	Potential Weld Wire Usage (1000 lbs/year)	Emission Factors (lb/1000 lbs electrode)					Emissions (tons/yr)				
			PM/PM10*	Cr	Co	Mn	Ni	PM/PM10*	Cr	Co	Mn	Ni
Gas Metal Arc Welding (L-50 and L-56)	32.87	145.72	5.200	1.00E-02	0	3.18E+00	1.00E-02	0.38	7.29E-04	0	0.23	7.29E-04
Welding (L-61)	41.49	183.93	5.200	1.00E-02	0	3.18E+00	1.00E-02	0.48	9.20E-04	0	0.29	9.20E-04
5356 Aluminum	0.07	0.29	24.10	1.00E-02	0	3.40E-02	0	3.53E-03	1.46E-06	0	4.97E-06	0
309/316 Stainless	0.76	3.35	10.80	7.52E-01	1.00E-03	2.52E-01	4.30E-03	0.02	1.26E-03	1.68E-06	4.22E-04	7.21E-06
Welding Rods	1.95	8.64	5.20	1.00E-02	0	3.18E+00	1.00E-02	0.02	4.32E-05	0	0.01	4.32E-05
<b>Total</b>								<b>0.90</b>	<b>2.95E-03</b>	<b>1.68E-06</b>	<b>0.54</b>	<b>1.70E-03</b>

**NOTES**

Emission factors are from Fire 6.24, and AP 42-19: Electric Arc Welding, Tables 12.19-1 and 12.19-2, (01/95).

Hours of Operation	Total work days in 2010	247
	Hours worked per day	8
	Total hours	1976

Actual Welding Wire Use Data taken from the opsEnvironmentalTM (Software) Material Usage Report, from 1/1/10 - 8/31/10, was utilized to determine welding wire usage. Welding wire was averaged for the 8 months and then extrapolated to 12 months usage

\* In the absence of valid PM2.5 emission factors, it is assumed that PM2.5 emissions = PM10 emissions

**METHODOLOGY**

Emissions (tons/yr) = Usage (1,000 lbs/yr) x Emission Factor (lb/1,000 lb electrode) x 1 ton/2,000 lbs

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
Spray Coating Operation Process Units**

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

Combustion Source	# of units	Heat Input per unit (MMBtu/hr)	Total Heat Input (MMBtu/hr)
Natural Gas Bake Oven (BK01)	1	1.65	1.65
Dry-Off Oven (NDO-01)	1	0.50	0.50
Water Heater #1	1	1.50	1.50
Water Heater #2	1	1.50	1.50
<b>Total</b>	<b>4</b>	<b>5.15</b>	<b>5.15</b>

Maximum Heat Input Capacity  
MMBtu/hr

5.15

Potential Throughput  
MMCF/yr

45.11

**Particulate Emissions**

Emission Factor in lb/MMCF	Criteria Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.043	0.171	0.171	0.014	2.26	0.12	1.89

\*PM emission factor is filterable PM only. PM10 & PM2.5 emission factors are filterable and condensable fractions combined.

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

**HAPs Emissions**

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.10E-03	1.20E-03	0.08	1.80	3.40E-03
Potential Emission in tons/yr	4.74E-05	2.71E-05	1.69E-03	0.041	7.67E-05

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03
Potential Emission in tons/yr	1.13E-05	2.48E-05	3.16E-05	8.57E-06	4.74E-05

**NOTES**

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 (SUPPLEMENT D 3/98).

**Total HAPs = 0.043 tons/yr**

**Worst Single HAP = 0.041 tons/yr (hexane)**

**METHODOLOGY**

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

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

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

Combustion Source	# of units	Heat Input per unit (MMBtu/hr)	Total Heat Input (MMBtu/hr)
Comfort Heater	1	6.60	6.60
Comfort Heater	3	0.12	0.36
Comfort Heater	3	0.09	0.27
Comfort Heater	1	0.10	0.10
Comfort Heater	1	0.04	0.04
Comfort Heater	1	0.495	0.50
Hot Water Heater	1	0.04	0.04
<b>Total</b>	<b>11</b>	<b>7.49</b>	<b>7.91</b>

Maximum Heat Input Capacity  
MMBtu/hr

7.91

Potential Throughput  
MMCF/yr

69.25

**Particulate Emissions**

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100.0	5.5	84.0
					**see below		
Potential Emission in tons/yr	0.066	0.263	0.263	0.021	3.46	0.19	2.91

\*PM emission factor is filterable PM only. PM10 & PM2.5 emission factors are filterable and condensable fractions combined.

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

**HAPs Emissions**

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.10E-03	1.20E-03	0.08	1.80	3.40E-03
Potential Emission in tons/yr	7.27E-05	4.15E-05	2.60E-03	0.062	1.18E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03
Potential Emission in tons/yr	1.73E-05	3.81E-05	4.85E-05	1.32E-05	7.27E-05

**NOTES**

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 (SUPPLEMENT D 3/98).

**Total HAPs = 0.065 tons/yr**

**Worst Single HAP = 0.062 tons/yr (hexane)**

**METHODOLOGY**

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
NEW Powder Coating Operation Process Units**

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

Combustion Source	Unit ID	# of units	Heat Input per unit (MMBtu/hr)
Washer Stage 1 Heater	WS-1	1	1.35
Washer Stage 3 Heater	WS-3	1	1.35
Cure Oven Zone 1 Booster	COB-1	1	1.12
Cure Oven Zone 1	CO-1	1	1.38
Cure Oven Zone 2	CO-2	1	2.00
Batch Cure Oven	BO-1	1	1.20
Steam Jenny	SJ-1	1	0.36
<b>Total</b>		<b>7</b>	<b>8.76</b>

Maximum Heat Input Capacity  
MMBtu/hr  
8.76

Potential Throughput  
MMCF/yr  
76.74

**Particulate Emissions**

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.073	0.292	0.292	0.023	3.84	0.21	3.22

\*PM emission factor is filterable PM only. PM10 & PM2.5 emission factors are filterable and condensable fractions combined.

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

**HAPs Emissions**

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.10E-03	1.20E-03	0.08	1.80	3.40E-03
Potential Emission in tons/yr	8.06E-05	4.60E-05	2.88E-03	0.069	1.30E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.00E-04	1.10E-03	1.40E-03	3.80E-04	2.10E-03
Potential Emission in tons/yr	1.92E-05	4.22E-05	5.37E-05	1.46E-05	8.06E-05

**NOTES**

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 (SUPPLEMENT D 3)

**Total HAPs = 0.072 tons/yr**

**Worst Single HAP = 0.069 tons/yr (hexane)**

**METHODOLOGY**

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

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

**Appendix A: Emissions Calculations  
Greenhouse Gas Equivalent Emissions (CO<sub>2</sub>e) from  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name:** Manchester Tank and Equipment Company  
**Address City IN Zip:** 905 X Street, Bedford, Indiana 47421  
**Permit Number:** F093-30518-00010  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 10/21/2010

Heat Input Capacity  
MMBtu/hr

21.8

Potential Throughput  
MMCF/yr

185.9

HHV  
MMBtu/scf

1.03E-03

	Greenhouse Gas		
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	11,153.66	0.21	0.20
Summed Potential Emissions in tons/yr	11,154.08		
CO <sub>2</sub> e Equivalent Emissions (tons/yr)	11,221.54		

**Methodology**

Emission Factors for CO<sub>2</sub> and CH<sub>4</sub> from 40 CFR Part 98 Subpart C, Tables C-1 and 2, have been converted from kg/mmBtu to lb/MMCF. Emission Factor for N<sub>2</sub>O from AP-42 Chapter 1.4 (dated 7/98), Table 1.4-2 The N<sub>2</sub>O Emission Factor for uncontrolled is 2.2. The N<sub>2</sub>O Emission Factor for low Nox burner is 0.64.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

HHV = Default high heat value of the fuel from Table C-1 of 40 CFR Part 98 Subpart C.

Potential Throughput (MMCF/yr) = [Heat Input Capacity (MMBtu/hr) \* 8760 (hrs/yr)] / [HHV (MMBtu/scf) \* 1,000,000 (scf/MMCF)]

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

CO<sub>2</sub>e (tons/yr) = CO<sub>2</sub> Potential Emission ton/yr x CO<sub>2</sub> GWP (1) + CH<sub>4</sub> Potential Emission ton/yr x CH<sub>4</sub> GWP (21) + N<sub>2</sub>O Potential Emission ton/yr x N<sub>2</sub>O GWP (310).

updated 12/10



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

*Thomas W. Easterly*  
**Commissioner**

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

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

**TO:** Tiffany Smith  
Manchester Tank and Equipment Company  
905 X Street  
Bedford, IN 47421

**DATE:** August 24, 2011

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

**SUBJECT:** Final Decision  
New Source FESOP  
093 - 30518 - 00010

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

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

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

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

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Governor**

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[www.idem.IN.gov](http://www.idem.IN.gov)

August 24, 2011

TO: Bedford Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

**Applicant Name: Manchester Tank and Equipment Company**  
**Permit Number: 093 - 30518 - 00010**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or 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.

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

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9		Mr. Danny Arnold 407 Northwood Dr Bedford IN 47421 (Affected Party)										
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